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CASSIA

RESOURCE MANAGEMENT PLAN

ENVIRONMENTAL IMPACT STATEMENT

FINAL

Jim Sage Mountain, southwest of Malta, Idaho

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Burley District
Route 3, Box 1
Burley, Idaho 83318

IN REPLY
REFER TO: 1792 Cassia

Dear Reader:

Attached for your review is the Final Cassia RMP Environmental Impact Statement. The statement was prepared by the Burley District, Bureau of Land Management, pursuant to Section 102 (2)(C) of the National Environmental Policy Act of 1969.

The statement describes and analyzes the environmental, economic, and social effects of proposed resource management on 476,273 acres of public land in southcentral Idaho. Four alternatives and one sub alternative levels of resource management are considered.

The preparation of this final statement differs from the past procedure of reprinting the entire draft statement. This statement includes only those changes that are necessary in the Draft EIS and responses to public comments received on the Draft EIS.

This document, used with the draft statement distributed to the public on December 16, 1983, constitutes the Final Environmental Impact Statement.

This final statement is not a decision document; it merely discloses the probable impacts to the human environment that the proposed actions and alternatives would create. The decision on the action to be taken will be based on the analysis contained in the final EIS, BLM's manpower and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs for the area. The proposed plan cannot be approved until after the Governor of Idaho has 60 days in which to identify inconsistences and provide recommendation in writing, or 30 days following filing of the final statement with the Environmental Protection Agency and distribution to the public, whichever comes later.

A summary document outlining the management direction for the Cassia RMP/EIS area will be prepared and made available as soon as a decision is reached.

Thank you for your interest and participation.

Sincerely yours,

John Davis

John S. Davis
District Manager

Enclosure

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DEPARTMENT OF THE INTERIOR

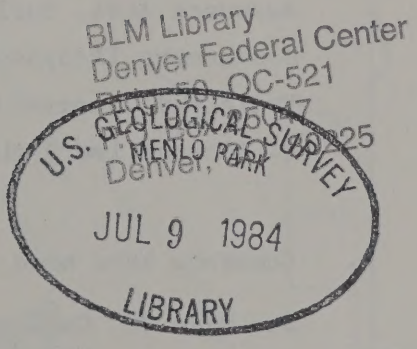
CASSIA

RESOURCE MANAGEMENT PLAN

AND

EVIRONMENTAL IMPACT STATEMENT:

FINAL



PREPARED BY

BUREAU OF LAND MANAGEMENT

BURLEY DISTRICT OFFICE

IDAHO

CLAIR WHITLOCK, BLM STATE DIRECTOR

CASSIA RMP

ENVIRONMENTAL IMPACT STATEMENT

1. Responsible Agency: United States Department of the Interior
Bureau of Land Management

2. Draft ( ) Final (X)

3. Title: Cassia Resource Management Plan and
Environmental Impact Statement

Burley District

Cassia and portions of Twin Falls, Power,
and Oneida Counties, Idaho

4. Administrative Action (X) Legislative Action ( )

5. Abstract: This final resource management plan and environmental impact statement describes and analyzes four alternatives and one sub alternative for managing 476,273 acres of public land in the Snake River Resource Area, Burley District. They are: (A) Continuation of Existing Management (Proposed Action for Livestock Grazing); (B) Production; (C) Preferred Alternative; and (D) Protection. The Sub Alternative consist of Alternative D with no livestock grazing.

6. Comments have been requested and received from the following:

See Page 26 Comments on the draft statement were received from those agencies, organizations, and individuals marked with an asterisk.

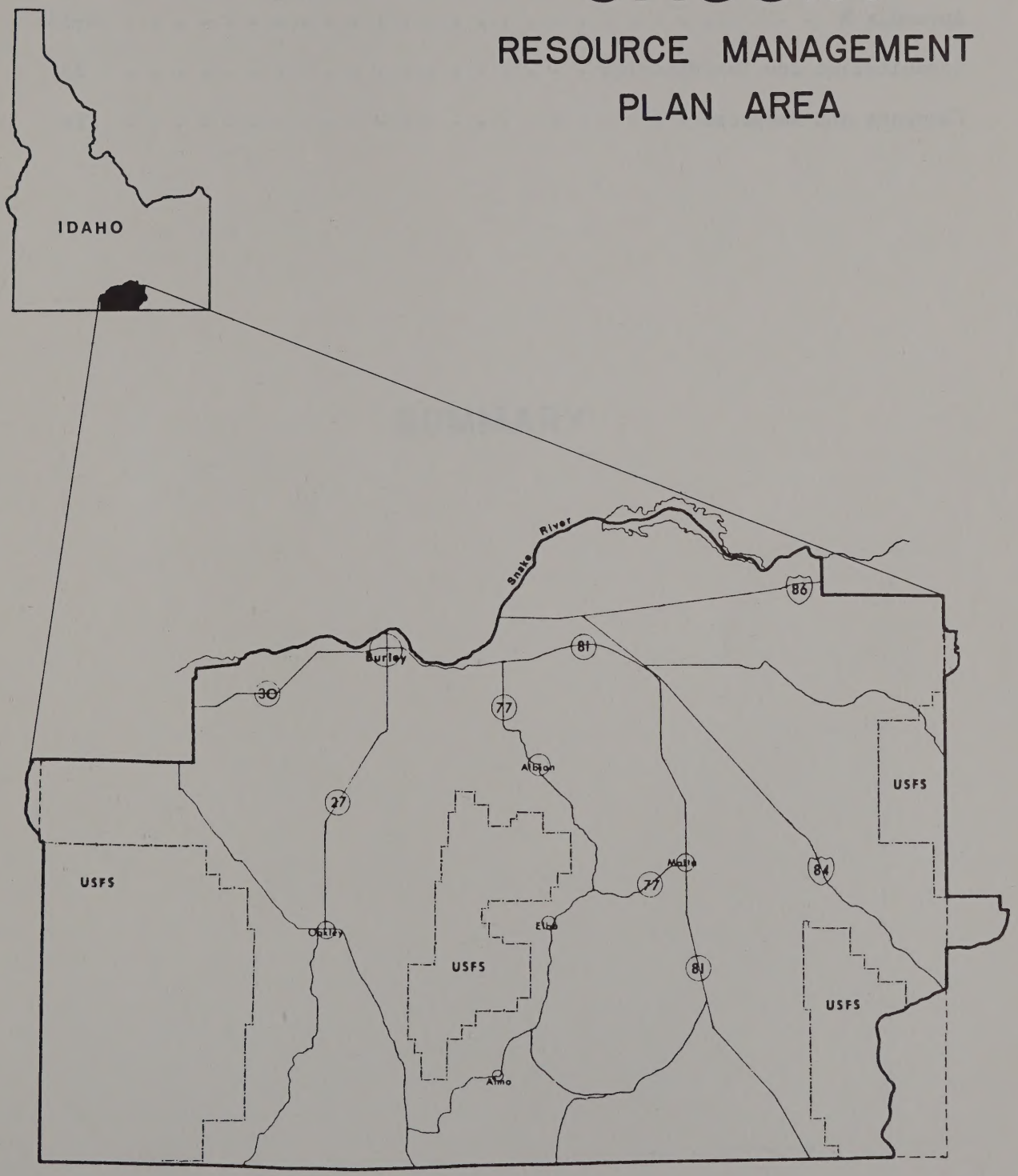
7. Date Draft Statement made available to EPA and the Public:

Draft - December 16, 1983.

MAP 1-1

CASSIA

RESOURCE MANAGEMENT PLAN AREA



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SUMMARY

SUMMARY

This final environmental impact statement (FEIS) describes five potential options for managing the resources on 476,273 acres of public land in the Snake River Resource Area in the Bureau of Land Management's Burley District. Each of the resource management alternatives described provides a different framework for or philosophy of management of the public lands and resources. Each of the alternatives provides differing choices for addressing internal management concerns and for resolving public issues.

The purpose of a resource management plan (RMP) is to ensure that the public lands will be managed in accordance with the principles of multiple use and sustained yield. To achieve this purpose the planning process must be responsive to major public issues as determined through public participation, consultation, and coordination. The RMP serves as a master plan to guide Bureau management and to tell others how the lands and resources in the planning area will be managed.

The four alternatives and one sub alternative considered, in summary, are:

ALTERNATIVE A

This alternative is the "No Action" alternative allowing for the management and flow of outputs from the public lands and resources at present levels as directed by an existing 1974 land use plan.

Present management generally favors mineral development. Nearly all of the public lands are open for development of leasable and locatable minerals. Use of saleable minerals is precluded on 11 percent of the area. Local demand for sand and gravel would be met over the next 15 years. The locally significant mining industry that has developed around Oakley Stone would be protected from restrictive withdrawals that would hinder development of this resource.

Livestock grazing would be maintained at the current 6 year average use level of 58,316 AUMs. No new range improvements or land treatment would be initiated. There would be little opportunity to improve grazing management. Seventy percent of the rangeland would remain in fair or poor condition with 84 percent in static or downward trend. Over a period of years livestock grazing would be reduced by six percent to 54,575 AUMs as 33,199 acres of grazing land were transferred into private hands.

The forage need for big game would not be increased, holding mule deer and antelope to present levels. Forage production would be suppressed in nearly 75 percent of crucial deer winter range as a result of late fall and early spring grazing by livestock. There would be a general slow decline in habitat conditions for upland game. As riparian/wetland management objectives continued to be ignored this unique resource would suffer further degradation of streambank cover, water quality, and fishery potential. Threatened and endangered species would be protected in accordance with federal law. The protection of wildlife species considered sensitive by the State of Idaho would be insured at the time of project-specific site planning.

Fifty-nine percent of the woodland resource would be open to the harvest of posts and firewood. Projected 1990 demand for these products would be met. Existing management of the pinyon resource would be continued with 520 trees made available to the public biennially.

The existing erosion rate of 4.1 tons/acre/year would continue. Water quality on slightly more than half of the area streams would exceed Idaho State water quality standards. Sedimentation of reservoirs, and flood intensity and frequency would increase. Flooding along four critical floodplains would go unchecked. Springs supplying water to the City of Oakley would not receive adequate protection and periodic bacterial contamination could be expected. The status of 75 percent of wetland/riparian areas presently in fair or poor condition would decline.

Except for measures required by law and policy, actions would not be initiated to manage for cultural resources. The trend in the condition of both known and unidentified cultural sites would be downward. However, 43 miles of the Oregon Trail and other pioneer routes, as well as the City of Rocks, would be protected and managed for their historic value.

Recreation management emphasis is on the provision of dipersed motorized and non-motorized activities. Hunting opportunity would stabilize. Slightly more than 50 percent of the area is open to both wheeled and over snow vehicles with the bulk of the remaining acreage seasonally off limits to off-road vehicles to protect wintering deer and nesting sage grouse. Provisions for intensive recreation uses include archery (60 acres), trap shooting (80 acres), motocross (20 acres), and snowmobiling (160 acres).

Management of visual or scenic quality is specificially recognized. Cotterel Mountain would be managed to maintain open space and scenic vistas, 27,250 acres on Jim Sage Mountain would be designated a natural area, a travel zone would protect scenic values along the Goose Creek Road south of Oakley to the Utah border. Because of its historic and geologic significance, the City of Rocks would be managed to preservse its natural character.

A total of 33,679 acres would be transferred out of federal ownership. Major utility lines and pipelines are restricted to 53 miles of designated rights-of-way corridor while 91 percent of the area is open to location of smaller rights-of-way. Landfills may be located on 98 percent of the area and projected future demands for this important public use would be met.

This alternative calls for the most agressive fire suppression program with a 73 percent of the area scheduled for maximum containment of wildfire. In addition this management option has the lowest acreage available for prescribed burning to manage fire to meet other resource program objectives.

The local economy would not be adversely affected by this alternative. Direct and secondary income would increase slightly in both the short and long term as would employment. Rancher income would not be affected. Of the five management options under study this alternative is the fourth best in terms of economic efficiency. There would be no measureable effect upon social conditions in the area.

ALTERNATIVE B

This alternative is directed toward the production and use of marketable resource commodities. Management emphasis is on maximizing livestock production and the harvest of woodland products. Minimal constraints are placed on mineral and energy development. Recreation emphasis is geared toward dispersed motorized recreation.

This management option places little constraint on the mineral industry. All of the area is open to locatable and leasable minerals, with greater than 99 percent open for energy resource and saleable mineral development. Middle Mountain is designated an intensive management area to accommodate present mining and facilitate future development of the Oakley Stone building resource.

Initially livestock use would be increased seven percent to 62,150 AUMs. Land treatments proposed on 117,930 acres would provide an additional 23,118 AUMs of forage. The long-term livestock use goal is 85,268 AUMs, 46 percent greater than six year (1976-81) average licensed use. As a result of land treatments, range condition and trend would improve significantly, providing the greatest percentage of good to excellent condition range of all alternatives. Over a period of years 1,588 AUMs of livestock forage would be lost as 15,308 acres are transferred out of BLM control.

At best, mule deer and antelope numbers would be held to present levels. Several factors would constrain big game populations: forage production would be suppressed on nearly 75 percent of crucial deer winter range as a result of a 46 percent increase in late fall and early spring grazing by livestock; though limited use occurs, off-road vehicle access to winter range and fawning areas would be unrestricted; 35 percent of deer winter range would be treated to increase forage production for livestock; energy exploration and development would not be restricted on winter ranges. The quality of upland game habitat would decline. Additional livestock use would increase trampling, nest desertion, and the loss of succulent forbs in sage grouse brood-rearing areas. Large scale livestock oriented land treatments and vegetative conversions would adversely affect the food source and cover for a variety of upland game species as well as decrease the prey base for many birds of prey such as the "sensitive" ferruginous hawk. There would be an areawide decline in fisheries habitat. Riparian/wetland habitat conditions for wildlife would be well below optimum, lowest of all the alternatives.

All of the woodland habitat type would be open to firewood and post cutting. Projected 1990 demand would be met. All of the highly productive pinyon type in the area of City of Rocks would be available for Christmas tree harvest providing 750 trees on a biennial basis. This would, however, necessitate harvesting within the boundary of the proposed City of Rocks National Monument.

Erosion would increase on 71 percent of the RMP area. The erosion rate of 5.1 tons/acre/year represents a 24 percent increase from the present situation. Land treatments to increase livestock forage would occur on fragile soils in the Goose Creek area. Water quality on 75 percent of the area streams, 21 percent more than at present, would exceed Idaho State water quality standards. Sedimentation would severely inhibit aquatic habitat and other downstream uses. Four critical floodplains would receive special management attention aimed at increasing plant cover and improving channel stability.

This is the least favorable of the management options for cultural resources. Impact from livestock trampling would increase on 86 percent of known sites. The areawide increase in erosion would result in a large increase in surface modification and horizontal displacement of artifacts at both known and unidentified sites.

Of all of the Alternatives this is the most favorable toward off-road vehicle use with 87 percent of the area open to wheeled and 99 percent open to over snow vehicles. ORV use would increase 26 percent from the current situation. The East Hills (3,711 acres) would be intensively managed for trail bike use. Reflecting lower wildlife numbers, hunting opportunity would decline by 28 percent.

Areas containing natural values or scenic quality are not specifically provided for under this alternative.

The alternative includes the second most agressive land transfer program with 15,638 acres scheduled to pass out of federal ownership. Nearly all the public land is open to location of rights-of-way, and 98 percent is open to siting of landfills.

The fire management philosophy under this alternative calls for limited suppression on 90 percent of the area and allows prescribed fire to be set on 96 percent of the area to achieve resource management (forage) objectives of the range program.

Of the land use options considered, the largest increase in rancher income and long-term employment would be realized by this alternative. Relative to the other alternatives this option has the lowest economic efficiency.

ALTERNATIVE C

This alternative represents BLM's favored management approach. It is designed to provide a variety of land uses and resource outputs within the multiple use concept and sustained yield capabilities of the public lands.

This is the second most favorable alternative toward the mineral industry with 99 percent of the area open to locatable, leasable, and saleable minerals. Although energy resources may be leased and developed on 99 percent of the area, 71 percent includes seasonal closures to protect wintering deer and strutting/nesting sage grouse. No restrictions have been placed upon the building stone industry. Local sand and gravel demand would be met over the next 15 years.

Approximately 97 percent of known woodland stands would be intensively managed for the production of posts and firewood. Projected 1990 demand for these products would easily be met. Existing management of the pinyon resource would be continued with 520 trees made available biennially.

Initially livestock use levels would be increased seven percent to 62,150 AUMs. Land treatments proposed for 82,176 acres would provide an additional 15,958 AUMs of forage. The long-term stocking level goal is 78,108 AUMs, 34 percent greater than six year (1976-81) average licensed use. Primarily as a result of land treatments, the 30 percent of rangeland in good to excellent

condition would increase to 67 percent while the 16 percent in upward trend would improve to 66 percent. Over a period of years 1,270 AUMs of livestock forage would be lost as 11,749 acres are transferred out of BLM control.

The effect on wildlife, for the most part, would be positive. Forage to meet projected 1995 mule deer and antelope populations would be provided. Cover, food, and general habitat diversity would be improved on 17 percent of deer winter range scheduled for land treatment. The additional forage resulting from land treatment for both livestock and mule deer would help ease the competition on mule deer winter range. In most areas this competitive use would be for one month or less and on the aveage only 30 percent of the affected allotments are considered as crucial winter range. Though much of the deer winter range is open to ORV use, conditions do not favor snow machine use so impacts would be minimal.

Twenty-four percent of sage grouse habitat would be improved through increased forb production and better habitat dispersion resulting from land treatment. The habitat for the sensitive species, ferruginous hawk, would be maintained by providing a buffer zone around known nest sites. Providing for wildlife leave areas in land treatment projects would enhance jack rabbit and rodent populations, thus providing a food source for the ferruginous hawk. Fisheries habitat would receive some protection at various times of the year through livestock grazing management systems.

Erosion would decrease on 24 percent of the area. The average erosion rate of 3.8 tons/acre/year represents a seven percent decrease over the present situation. Present water quality conditions would remain static or show some improvement over the long term. Critical soils and floodplains would be protected which would reduce the threat of flooding. Because of improved management and resource monitoring, wetland/riparian conditions would remain stable or show slight improvement over the long term. Springs feeding the Oakley City water system would be managed to eliminate bacterial contamination of this water supply.

Management of cultural resources would be emphazied on 27,268 acres west of Goose Creek. Impacts from livestock trampling would increase on 79 percent of known cultural sites within the RMP area . Historic pioneer trails would be protected in the Raft River, Milner, and City of Rocks areas.

This land use option would provide a variety of motorized and non-motorized recreation opportunity. Fifty-four percent of the area would be open to wheeled vehicles, 80 percent to over snow vehicles, representing a respective four percent decrease and 27 percent increase in open acreage from current management direction. Off-road vehicle use is projected to increase 14 percent above the current level. Hunting is projected to increase 18 percent from the current level. Five special recreation management areas totaling 56,437 acres would be established to provide a variety of recreation opportunity such as hiking, horseback riding, and motorcycle riding.

The outstanding scenic quality of the City of Rocks would be protected via management objectives that would exclude future landscape modification from fences, powerlines, and land treatments. Jim Sage Mountain above 6,600 feet (11,227 acres) would be managed to protect natural area values. Protecting scenic quality is a management objective on Cotterel Mountain and along the Goose Creek travel zone south of Oakley to the Utah border.

Direction for the lands program calls for transfer of 11,652 public acres out of federal ownership. Rights-of-way may be located on almost all of the public lands although major facilities are restricted to existing locations on the 40,967 acre Cotterel unit. Ninety percent of the area is open for the location of sanitary landfills, fulfilling the public demand for this land use.

The fire management philosophy is to protect fragile resources and protect intermingled private land via the use of maximum wildfire suppression on 36 percent of the area. Limited suppression would be practiced on the remaining public lands as a mechanism of achieving resource management objectives such as increasing livestock forage production and enhancing watershed cover.

Economically this is a beneficial land use option. The income for all sizes of ranch operations would increase in both the short and long term. Employment would increase as would income. Net present worth would increase 10 percent over present management. In terms of economic efficiency, this is the third (middle) option.

ALTERNATIVE D

Management direction under this land use option is geared toward the protection and enhancement of wildlife habitat, scenic values, watershed values, and cultural resources. Non-motorized dispersed recreation is emphasized.

Livestock use levels would be set at 44,774 AUMs, 23 percent below six year (1976-81) average licensed use. As a result of lower livestock use the present 30 percent of rangeland in good to excellent condition would increase to 65 percent while the 16 percent in upward trend would improve to 51 percent.

Overall, wildlife would benefit. Forage would be provided for projected 1995 mule deer and antelope numbers. Forage competition between livestock and mule deer on winter range would be minimized. All upland game would benefit. Sage grouse populations would increase as a result of improved nesting and brood-rearing cover due to reduced livestock grazing. All riparian areas would improve, benefitting all species dependent upon these areas. Birds of prey and other predators would benefit from a more stable prey base.

Watershed conditions would greatly improve. Soil erosion would decrease from 4.1 to 3.5 tons/acre/year and erosion would decrease on 23 percent of the area. Water quality would improve with sub standard conditions minimized or possibly eliminated. Flooding and surface water yield would decline. Improved infiltration would contribute to greater aquifer recharge. The Oakley City water supply would be protected reducing the likelihood of bacterial contamination.

This option opens the smallest percent (22) of the woodland resource to post and firewood harvest. Projected 1990 public demand for these woodland products would still be met. There would be no harvest of pinyon Christmas trees. Curtailment of the pinyon harvest is aimed at preserving the largest stand of these trees in Idaho and the most northern stand in the U. S.

Slightly more than 90 percent of the planning area is open to development of leasable, locatable, and saleable minerals. There are greater restrictions on

energy resource development than in any alternative, with seasonal closures to protect wintering mule deer and nesting sage grouse on 90 percent of the area.

Present and future demand for sand and gravel would be met. All known deposits of Oakley stone would be available for development with the exception of 41 acres underlying wetland/riparian habitat.

Dispersed non-motorized recreation is emphasized. Hiking, horseback riding, and cross-country ski trails would be developed on 65,047 acres. Designations for wheeled off-road vehicles include eight percent of the public land open, 87 percent limited, five percent closed, while the status for over snow vehicles would be nine percent open, 38 percent limited, and 53 percent closed. The increase in the limited and closed designations would provide protection for crucial wildlife habitat. Off-road vehicle use would decline 15 percent from present levels. Hunting would increase 31 percent from the present use level as a result of improved wildlife habitat.

This option favors visual quality. No vegetative conversions for the benefit of livestock, coupled with a 23 percent reduction in livestock grazing would enhance scenic quality throughout the area. City of Rocks would be managed as an area of critical environmental concern to protect the outstanding scenic quality of the area as well as its geologic and historic significance. A portion of Jim Sage Mountain (24,080 acres) would be managed to protect the unroaded character and open space nature of this area. Open space and scenic values would be preserved on the 40,967 acre Cotterel Mountain unit.

Cultural resources would benefit. Seventy-eight percent of known cultural sites would be subjected to substantially less livestock trampling. Less soil erosion would translate into less artifact displacement and site damage. Pioneer trails in the Milner, Raft River, and City of Rocks areas would be protected from surface disturbing activities.

Only 560 acres (Raft River Geothermal Site) would be transferred out of federal ownership. Landfills could be located on 68 percent of the area while 94 percent would be available for location of rights-of-way. Demand for both of these land uses would be satisfied.

All sizes of ranch operations would loose income in both the short and long term. Up to 85 out of 147 ranchers may have to seek outside employment, consider ranch consolidation or sell. There would be an initial employment loss which would stabilize over the long term. Net present worth would be the highest of all alternatives while economic efficiency as measured in terms of benefit/cost ratio would be the second best.

SUB ALTERNATIVE D

This sub alternative is designed to provide a baseline from which to evaluate the consequences of various levels of livestock use. Under this land use option the management objectives for all resources except livestock grazing are the same as in Alternative D. Impacts on woodland products, minerals, and lands are the same as in Alternative D.

No livestock grazing would result in the present 30 percent of rangeland in good to excellent condition improving to 64 percent with the present 16

percent in upward trend improving to 88 percent. The condition of all riparian vegetation would improve significantly.

Projected 1995 mule deer and antelope populations would be met. All livestock/wildlife related conflicts such as forage utilization and nest trampling would be eliminated. Improved riparian habitat and water quality would benefit fisheries, waterfowl, furbearers, and other species that utilize these areas. Initial population increases for upland game, long-billed curlew, and the western burrowing owl would decline over the long-term as a result of various habitats becoming overgrown and choked with dense vegetation.

Soil loss would decrease 46 percent from 4.1 to 2.2 tons/acre/year. Overall watershed condition would improve. Water quality would meet or exceed state standards. Flood potential would decrease because of improved watershed cover. Springs that feed the Oakley City water supply would be protected.

As a result of improved wildlife conditions, hunting would increase 42 percent over the present use level. More visual diversity and contrast would result. Livestock trampling and subsequent breakage and displacement of artifacts would decrease by 100 percent. A 46 percent decrease in soil erosion would result in signficantly less artifact displacement on 94 percent of known cultural sites.

Rancher income would decline in both the short and long term. The loss in ranch income would be so acute that 142 out of 147 permittees would have to seek outside employment to subsidize income or sell their ranch. The local economy would experience significant direct and indirect income losses. Economic efficiency as measured in terms of benefit/cost ratio would be the highest of all management options.

Resource Outputs by Alternative

A variety of land uses and resource commodities can be accommodated on or supplied by public lands in the Cassia RMP area. These uses and commodities involve both consumable resource goods and non-consumable resource values. The following table provides a general comparison of these resource uses and outputs by alternative. In comparing the alternatives, it should be understood that the numbers may not be absolute, although the relationships depicted between alternatives are valid.

Output	Unit of Measure	Alternative A	Alternative B	Alternative C	Alternative D	Sub Alternative D
Multiple Use Areas						
Limited Use	Acres/%	33,403/7.0	2,560/0.5	8,633/1.8	238,765/50.1	238,765/50.1
Moderate Use	Acres/%	434,571/91.2	461,128/96.8	467,621/98.2	237,489/49.9	237,487/49.9
Intensive Use	Acres/%	8,299/1.8	12,585/2.7	19/0.0	19/0.0	19/0.0
Transfer Areas						
Private Exchange	Acres/%	5,725/1.2	6,004/1.3	5,234/1.1	- - -	- - -
State Exchange	Acres/%	1,124/0.2	2,959/0.6	2,959/0.6	- - -	- - -
Forest Service Transfer	Acres/%	- - -	2,042/0.4	2,042/0.4	- - -	- - -
Other Disposal	Acres/%	26,830/5.6	6,675/1.4	3,469/0.7	560/0.1	560/0.1
Soils/Watershed						
Soil Erosion Rates	Tons/Acre/Year	4.1	5.1	3.8	3.5	2.2
High Erosion Soils Protected	Acres	36,885	0	36,885	36,885	36,885
Critical Floodplains Protected	Acres	0	2,000 Shirley, Warm, Meadow, and One Mile Creeks	2,000 Same as Alternative B.	2,000 Same as Alternative B.	2,000 Same as Alternative B.
Flood Prone Watershed Protected	Acres	4,887 Beaverdam Creek	0	4,887 Beaverdam Creek	4,887 Beaverdam Creek	4,887 Beaverdam Creek
Domestic Water Supply Protected	Acres	0	0	480 City of Oakley	480 City of Oakley	480 City of Oakley
Vegetation						
Condition						
Excellent	Acres/%	43,299/9	130,137/28	131,686/28	194,019/41	172,458/37
Good	Acres/%	99,735/21	209,739/45	183,168/39	110,344/24	128,124/27
Fair	Acres/%	175,103/37	77,515/16	89,621/19	105,585/22	75,682/16
Poor	Acres/%	151,156/33	51,902/11	64,818/14	59,345/13	93,029/20
Trend						
Up	Acres/%	77,731/16	327,395/70	309,242/66	241,082/51	413,515/88
Static	Acres/%	275,275/59	123,783/26	139,997/30	199,232/43	49,910/11
Down	Acres/%	116,287/25	18,115/4	20,054/4	28,979/6	5,868/1
Cover	Percent	32	33	33	33	34
Woodland Products						
Habitat (100,803 acres)	Acres Open/Cords	60,035/3,056	100,803/5,132	97,803/5,132	22,658/1,153	22,658/1,153
Pinyon Christmas Trees	Bicennial Cut	520	750	520	0	0
Wildlife						
Mule Deer						
Use Level	AUMs	9,918	9,918	13,569	13,569	13,569
Winter Range Protected	Acres/Type	72,776/Crucial	0	72,776/Crucial	154,795/All Winter	154,795/All Winter
Antelope						
Use Level	AUMs	167	167	721	721	721
Yearlong Range Protected	Acres	78,280	0	0	78,280	78,280
Sage Grouse						
Habitat Protected	Acres/Type	21,642/Crucial	0	21,642/Crucial	279,223/All	279,223/All
Key Riparian Areas Protected	Acres	187	0	14	189	189
Isolated Wildlife Tracts	#/Acres	36/3,965	29/2,925	36/3,965	36/3,965	36/3,965
Livestock Grazing						
Use Level	AUMs (Initial/Long Term)	58,316/58,316	62,150/85,268	62,150/78,108	44,774/44,774	0/0
	% Change from Six Year Average (Initial/Long Term)	0/0	+6.6/+46.2	+6.6/+33.9	-23.2/-23.2	-100/-100
New Land Treatments	Acres	0	117,930	82,176	0	0

Output	Unit of Measure	Alternative A	Alternative B	Alternative C	Alternative D	Sub Alternative D
Recreation						
Visitor Days (RVD) (Year 2000)						34,253
Hunting	RVDs	24,096	17,400	28,380	31,654	35,000
ORV Use	RVDs	41,200	52,000	47,000	35,000	265,000
Other Dispersed	RVDs	262,500	265,000	270,000	265,000	
Off-Road Vehicle Use						
Wheeled Vehicles						36,398
Open	Acres	274,736	415,348	256,639	36,398	414,155
Limited	Acres	201,367	60,925	219,154	414,155	25,720
Closed	Acres	180	0	480	25,720	
Over Snow Vehicles						44,753
Open	Acres	252,144	472,308	382,202	44,753	180,836
Limited	Acres	151,173	3,965	45,197	180,836	250,764
Closed	Acres	72,956	0	48,374	250,764	
Special Designations						0
Natural Areas	No./Acres	1/27,250	0	0	0	1/1,628
ACECs	No./Acres	0	0	0	1/1,628	3/66,207
Special Rec.Management Area	No./Acres	4/45,210	4/47,293	5/56,437	3/66,207	0
Open Space, Scenic Area	No./Acres	1/40,967	0	0	0	
Cultural Resources						27,268
Key Areas Protected	Acres	0	0	27,268 West Goose Creek	27,268 West Goose Creek	West Goose Creek
Minerals						
Energy						44,734/9.4
Open	Acres/%	53,010/11.1	473,694/99.5	134,105/28.2	44,734/9.4	- - -
Closed	Acres/%	2,055/0.4	- - -	- - -	- - -	428,305/89.9
Seasonal Closure	Acres/%	420,629/88.3	- - -	337,054/70.8	428,305/89.9	5,424/1.1
No Surface Occupancy	Acres/%	3,099/0.7	2,579/0.5	5,394/1.1	5,424/1.1	
Leasables						437,964/92.0
Open	Acres/%	471,119/98.9	476,254/100.0	474,199/99.6	437,964/92.0	38,309/8.0
Closed	Acres/%	5,154/1.1	19/0.0	2,074/0.4	38,309/8.0	
Locatables						437,964/92.0
Open	Acres/%	471,119/98.9	476,254/100.0	474,199/99.6	437,964/92.0	38,309/8.0
Closed	Acres/%	5,154/1.1	19/0.0	2,074/0.4	38,309/8.0	
Saleables						432,839/90.9
Open	Acres/%	434,101/91.1	473,694/99.5	470,011/98.7	432,839/90.9	43,434/9.1
Closed	Acres/%	42,172/8.9	2,579/0.5	6,262/1.3	43,434/9.1	
Lands						449,125/94.3
Area Open to Rights-of-Way	Acres/%	473,630/99.4 Major utility & pipeline R/Ws restricted to corridors on 273,923 acres.	474,833/99.7	473,290/99.4 Major R/Ws restricted to existing localities on 40,967 acres.	449,125/94.3 Same as Alternative C.	Same as Alternative C.
Area Open to Sanitary Landfills	Acres/%	465,403/97.7	466,033/97.8	426,358/89.5	321,392/67.5	321,392/67.5
Fire Management						39,752
Maximum Suppression	Acres	348,083	49,517	173,611	39,752	437,511
Limited Suppression	Acres	123,130	426,756	302,652	437,511	350,464
Prescribed Burning	Acres	232,546	456,293	460,895	350,464	
Economics						-144
Employment Gain/Loss (Long Term)	Number	+33	+110	+105	0	
Net Present Worth	Dollars	27,551,115	26,774,980	30,356,237	35,390,403	32,730,560
Benefit/Cost Ratio	Return per Dollar	3.75	3.58	3.99	4.66	4.93

TEXT REVISIONS

TEXT REVISIONS TO DRAFT EIS

Page xvi - Appendices
Add Appendix N - Allotment Acreage Summary---203.

Page 15 - Comment 15-1
Add groundwater quality to list of criteria for proposed landfill sites.

Page 19 - Add the following sentence - "The areas with restrictions or closures can be found on Table 2-1 page 32, Table 2-3 page 36, Table 2-5 page 41 and Table 2-7 page 45."

Page 22 - Land Treatment paragraph. (Comment 15-2)
Add to end of paragraph "All range treatment will be approached on a site specific basis and be subject to environmental assessment where hazards and mitigation will be addressed.

Page 25 - Management Area 8 - City of Rocks
Add after "Totaling 17,827 acres" the words "of public Lands"

Add to the end the following sentence, "In Sub Management Area 8a and 8b future utility right-of-way will be excluded."

Page 26 & 27 - Management Area 11 - Cotterel Mountain
Add the following sentence "Limit right-of-way to existing facilities and localities."

Page 48 - Monitoring and Evaluation (Comment 19-1)
Between lines 5 and 6 add the following statement.
--determing whether additional forage is available for consumptive uses;

Page 52 - Table 2-10 - Minerals Management (Comment 6-1)
Under Alternative C how will energy resource development be accommodated, it should read as follows:

Open	134,105
No Occupancy	5,394
Seasonal Closure	337,054
Closed	0

Page 58 - Table 2-11 - Land and Realty Right-of-Way
Under Alternative B, C, and D add the following sentence. "Subject to environmental review of each application."

Page 64 - Third paragraph - Appendix G should read Appendix H.
Fourth paragraph, line 5 - Appendix H should read Appendix G.

Page 69 - Table 3-7 - Sensitive and Endangered Wildlife (Comment 20-1)
ferruginous hawk should show candidate species under federal status.
Swainson's hawk should be added to list with federal status of candidate species and occurrence common spring and summer breeder.

Page 105 - Paragraph One
The last sentence should be changed to read "Additional recreation facilities in the City of Rocks 'Core Area' will be ----"

Page 133 - Add Active Preference - "That portion of grazing preference which may be authorized either as active grazing or as voluntary non-use."

Page 136 - Add Grazing Cycle - "One complete application of grazing treatment on a pasture or management area usually requiring two or more years."

Page 140 - Add Short Term Active Preference - "Active preference authorized prior to implementation of a grazing system or land treatment. Synonymous to active preference."

Page 141 - Add Suspended Preference - "That protion of grazing preference which is suspended from active or non-use.

Page 143 - Add under Reference

Gibbens, R. P., and Fisser, H. G. 1975. Influence of grazing management systems on vegetation in the Red Desert region of Wyoming. Laramie, Wyoming: University of Wyoming Press. State Agricultural Experiment State, Science Monograph No. 29.

Leithead, H. L. 1960. Grass management pays big dividends. Journal of Range Management 13:206-10.

Van Poolen, H. Walt and Lacey, John R. 1979. "Herbage Response to Grazing Systems and Stocking Intensities," Journal of Range Management, 32:250-253.

White, Clayton M. and Thurrow, Thomas L. 1979. Annual Report - 1979 Ferruginous Hawks and Geothermal Development, submitted to Department of Energy, Idaho Operations Office, and EG&G, Inc., Idaho Falls, Idaho.

White, Clayton M. and Thurrow, Thomas L. 1981. Reproduction of Ferruginous Hawks Exposed to Controlled Disturbance, U. S. Department of Energy, EG&G, Idaho Falls, Idaho.

Page 163 - Appendix B - Grazing Managment and Seasons of Use (Comment 12-5)
Under Management Area 9, Warm Creek 5320 all alternatives should read from 4-15 to 12-30.
Under Management Area 9, Point Spring 5325 all alternatives should read from 5-1 to 11-15.
Under Management Area 10, Keogh 5051 all alternatives should read from 12-1 to 3-31.

Page 203 - Attach Appendix N which starts on page 14 of this Final RMP/EIS.

Map 1-2 - Land Status and Grazing Allotments (Comment 22-6)
T13S, R29E State land on east side should be green for Forest Service lands
T15S, R24E, Public land on north and west side of allotment No. 71 should be green for Forest Service land not yellow for public lands.

Map 2-2, 2-5 & 2-6 - Management Area 8b should not include Forest Service and State lands.

Map 2-5 - In T14S, R29E Allotment No. 150 as shown on Map 1-2 should be shown as a T-4 transfer to U. S. Forest Service.

Map 3-3 - Major Vegetation Types
In T12S, R27E the Pinyon vegetation type should be changed to show Wyoming Big Sagebrush/Mountain Big Sagebrush/Basin Blue Sagebrush vegetation type.

Map 3-11 - Minerals (Comment 12-8)
In T12S, R28E - Community Pits and Common Areas should be changed to only show Sand and Gravel FUPS area.

T122S, R27E - Sand and Gravel
FUPS area should also show as a Community Pit and Common Use Area.

APPENDIX N

ALLOTMENT ACREAGE SUMMARY

Management Area No.	Name	Federal	State	Private	Total
1	Milner	932	0	0	932
2	Foothills	48,256	2,560	3,165	53,981
3	West Goose Creek	27,106	2,675	1,685	31,466
4	Middle Mountain	39,948	4,923	3,382	48,253
5	Administrative Site	* (19)	0	0	* (19)
6	East Hills	3,671	0	1,921	5,592
7	Albion	21,205	994	8,225	30,424
8	City of Rocks	17,622	640	4,104	22,366
9	Raft River Valley	105,808	5,120	13,224	124,152
10	Jim Sage	76,297	4,120	2,992	83,409
11	Cotterel	40,507	1,920	1,547	43,974
12	Highway Unit	45,669	3,344	2,112	51,125
13	Sublett	40,594	2,149	14,763	57,506
14	Isolated Tracts	1,678	0	0	1,678
	Total Allotted	469,293	28,445	57,120	554,858
	Total Unallotted	*6,980			
	Total Federal	476,273			

* Not inventoried -- not included in allotted totals; included in unallotted.

Management Area 1

No.	Name	Federal	State	Private	Total
4065	Milner-Holyoak	932	0	0	932

Management Area 2

No.	Name	Federal	State	Private	Total
4025	Simon Baker	224	0	0	224
4032	Dry Creek-Artesian	3,264	0	960	4,224
4067	Buckhorn-Churchill	7,876	1,271	433	9,580
4068	Dry Creek	7,161	261	1,056	8,478
4069	Artesian-Kidd	4,869	638	653	6,160
4071	Artesian Kidd Iso.	243	0	0	243
4075	Marion Group	4,422	0	41	4,463
4081	Cold Spring	9,311	381	0	9,692
4087	Churchill-Mullen	1,280	0	0	1,280
4094	Churchill-Poulton	4,305	9	22	4,336
4110	Pickett-Wake	5,301	0	0	5,301
		48,256	2,560	3,165	53,981

Management Area 3

No.	Name	Federal	State	Private	Total
4026	Bruce Bedke-Private	2,454	0	15	2,469
4029	Karl E. Bedke-Goose Creek	319	161	0	480
4078	Mabey Goose Creek	1,842	0	132	1,974
4088	Goose Creek-Mullen	558	0	188	746
4093	Goose Creek-Poulton	6,088	413	884	7,385
4099	Beaver Dam	2,346	367	11	2,724
4100	North Emery	224	68	0	292
4103	Shoulder "3" Inc.	4,537	197	283	5,017
4104	Baker	2,639	1,469	44	4,152
4105	Day	348	0	0	348
4111	Warr-Pickett	5,751	0	128	5,879
		27,106	2,675	1,685	31,466

Management Area 4

No.	Name	Federal	State	Private	Total
4027	Goose Creek Group	28,730	2,733	1,348	32,811
4052	Critchfield-Ind.	211	0	354	565
4062	Harper-Goose Creek	338	0	43	381
4070	Worthington Springs	1,027	40	0	1,067
4089	Goose Creek-Ward	411	0	0	411
4090	Goose Creek	266	0	0	266
4112	Alastra	1,983	0	674	2,657
4113	Earl Whiteley	1,482	0	53	1,535
4116	Marchant-Goose Creek	1,034	0	830	1,864
4117	Goose Creek Private #1	2,401	317	80	2,798
4120	Junction Valley Parcels	149	0	0	149
4127	Stone Cabin Iso.	159	0	0	159
4134	Robinson Hole	1,507	1,833	0	3,340
4140	Birch Creek Parcels	250	0	0	250
		39,948	4,923	3,382	48,253

Management Area 5

No.	Name	Federal	State	Private	Total
- -	Administrative Site	19	0	0	19

Management Area 6

No.	Name	Federal	State	Private	Total
			0		
5007	Water Canyon	1,684	0	203	1,887
5009	Bridger Canyon	1,461	0	1,422	2,883
5010	View	326	0	296	622
5049	Marsh Creek Iso.	40	0	0	40
5052	North Albion	160	0	0	160
		3,671	0	1,921	5,592

Management Area 7

No.	Name	Federal	State	Private	Total
4028	Bedke-Churchill	1,801	0	317	2,118
4033	Callahan	809	0	1,119	1,928
4034	Callahan-Matthews	67	0	164	231
4056	Goose Creek-Fairchild	720	242	211	1,173
4061	Hedges	160	0	6	166
4064	Matthews-Churchill	120	0	0	120
4080	Martin Goose Creek	367	0	808	1,175
4082	Matthews-Goose Creek	820	0	1,766	2,586
4083	Willow Creek-Anderson	571	0	0	571
4084	Churchill-Matthews	1,476	4	321	1,801
4086	Goose Creek-McIntosh	80	0	263	343
4115	Big Cedar-Churchill	364	0	84	448
4118	Birch Creek	695	0	562	1,257
4128	Land Creek Iso.	40	0	0	40
4129	Fairchild Canyon	40	0	0	40
4130	Land Creek	466	0	4	470
4131	Mill Creek	240	394	1	635
4132	Two Knobs	80	0	0	80
5011	Pine Knob	399	0	528	927
5012	Lunch Creek	2,009	0	957	2,966
5013	Crystal	1,111	354	0	1,465
5014	Marsh Creek	221	0	471	692
5015	Howell Creek	840	0	0	840
5016	Sibley	724	0	0	724
5017	Conner Creek	2,262	0	11	2,273
5018	South Conner	480	0	0	480
5019	Rocky Hollow	280	0	0	280
5021	Middle Hill	2,647	0	112	2,759
5022	Grape Creek	916	0	160	1,076
5023	Cove	400	0	360	760
		21,205	994	8,225	30,424

Management Area 8

No.	Name	Federal	State	Private	Total
5024	Almo Creek	320	0	0	320
5025	Graham Creek	845	0	135	980
5026	Emery Creek	679	0	45	724
5027	Circle Creek	1,068	0	680	1,748
5028	Junction Creek	184	0	0	184
5029	Trail Canyon	1,640	0	1,074	2,714
5030	Tracy Lane	880	0	0	880
5031	Heath Canyon	1,464	0	913	2,377
5032	Smoky Mountain	1,335	0	0	1,335
5033	Moulton	383	0	320	703
5034	State Line	305	0	0	305
5035	Sparks Basin	1,919	640	582	3,141
5036	Junction Seeding	6,520	0	355	6,875
5053	Almo	80	0	0	80
		17,622	640	4,104	22,366

Management Area 9

No.	Name	Federal	State	Private	Total
5020	Idahome Iso.	780	0	0	780
5037	Almo Flat	1,174	640	174	1,988
5038	Cole Lane	624	0	0	624
5039	Gully	4,515	0	94	4,609
5040	Johnson Creek	2,080	640	0	2,720
5041	E-Y Flat	4,818	640	1	5,459
5042	George Creek	2,747	0	0	2,747
5043	Narrows Seeding	3,807	0	0	3,807
5044	State Spring	1,008	0	120	1,128
5045	Clear Creek	10,240	0	3,918	14,158
5046	Ward E-Y	960	640	480	2,080
5047	South Bridge	1,056	0	160	1,216
5048	Naf	734	0	0	734
5050	Glen	160	0	0	160
5320	Warm Creek	24,039	640	280	24,959
5326	Point Springs	8,227	0	40	8,267
5328	Point	12,786	640	2,400	15,826
5330	Sandrock	3,144	0	623	3,767
5331	Bridge	11,856	640	400	12,896
5332	Strevell	6,049	640	3,457	10,146
5333	Green Canyon	442	0	0	442
5336	Raft River Iso. #2	518	0	0	518
5338	Sublett Road Triangle	603	0	0	603
5339	H P & P	283	0	1,077	1,360
5340	Round Mountain	296	0	0	296
5341	Valley	320	0	0	320
5342	Railroad Grade	492	0	0	492
5343	Landing Field	960	0	0	960
5344	DOE	560	0	0	560
5345	Strip	280	0	0	280
5346	Cemetary	160	0	0	160
5347	Idahome Interchange	90	0	0	90
		105,808	5,120	13,224	124,152

Management Area 10

No.	Name	Federal	State	Private	Total
5003	Jim Sage	66,417	4,120	2,914	73,451
5004	Cassia Creek	3,902	0	40	3,942
5005	Almo-Womack	4,195	0	38	4,233
5006	Chokecherry	737	0	0	737
5051	Keogh	1,046	0	0	1,046
		76,297	4,120	2,992	83,409

Management Area 11

No.	Name	Federal	State	Private	Total
5001	North Cotterel	9,946	1,280	937	12,163
5002	South Cotterel	29,517	640	610	30,767
5057	Weigh Station	1,044	0	0	1,044
		40,507	1,920	1,547	43,974

Management Area 12

No.	Name	Federal	State	Private	Total
5301	Highway Common	22,656	2,035	332	25,023
5303	West Toevs	777	0	0	777
5304	East Toevs	1,074	29	0	1,103
5305	Kunau	5,927	640	1,548	8,115
5306	No Mans Land	3,020	0	160	3,180
5307	Basalt Seeding	3,005	0	0	3,005
5308	Raft River	5,683	640	10	6,333
5309	Yale	3,527	0	62	3,589
		45,669	3,344	2,112	51,125

Management Area 13

No.	Name	Federal	State	Private	Total
5313	Chapin	2,575	0	80	2,655
5314	Dairy Springs	8,998	1,829	3,538	14,365
5315	Warm Springs	2,220	0	1,044	3,264
5321	Antelope	3,699	0	0	3,699
5322	Shirley Creek	680	0	210	890
5323	North Lake Fork	1,233	0	13	1,246
5324	South Lake Fork	1,079	0	229	1,308
5325	Sublett	743	0	1,154	1,897
5327	Meadow Creek	13,372	0	619	13,991
5328	Point	5,755	320	7,876	13,951
5348	Burnt Canyon	240	0	0	240
		40,594	2,149	14,763	57,506

Management Area 14

No.	Name	Federal	State	Private	Total
4025	Simon Baker	120	0	0	120
4094	Churchill-Poulton	240	0	0	240
4133	Churchill Tracts	80	0	0	80
5054	Idahome Wildlife	280	0	0	280
5310	Gifford Springs	240	0	0	240
5311	Horse Butte	358	0	0	358
5312	Raft River Iso. #1	80	0	0	80
5337	Raft River Iso. #3	200	0	0	200
1031	Golden Valley Iso. Tract	40	0	0	40
1032	Churchill Tract	40	0	0	40
		1,678	0	0	1,678

CONSULTATION AND COORDINATION

Consultation and Coordination on The Draft

The Cassia Resource Management Plan and Evironmental Impact Statement Draft was filed with the Environmental Protection Agency and released to the public on December 16, 1983. The public review period ended March 15, 1984.

A public hearing on the draft was held on January 18, 1984, at the Burley City Hall. The hearing was attended by 13 people, 5 of whom presented oral testimony on the adequacy of the DEIS. The testimony is reproduced in this final.

Approximately 500 draft statements were distributed for review. From this review a total of 25 letters were received. All letters have been reproduced in this final, with each substantive comment identified and numbered. BLM responses immediately follow each of the letters.

In most cases, only comments pertaining to the adequacy of the DEIS--the analysis as distinct from the action analyzed--are formally answered in this document but all comments will be taken into account when it comes time to make the final decision regarding management in the Cassia Resourse Management Area.

A Text Revision Section found on page 11 of this document specifies text changes resulting from pulic and internal reveiw of this document.

Reviewers and Responsdents

The following list identifies all agenices, organizations, and individuals to whom copies of the draft EIS were sent. All on the list were requested to comment on the adequacy of the statement. Many on the list had already contributed to the development of the statement. Those individuals, agencies, and organizations presenting oral or written comment are denoted by an asterisk (*).

Elected Officials, Federal

Senator James McClure
Senator Steven Symms
Congressman George Hansen

Federal Agencies

Department of Agriculture
* Soil Conservation Service
* U. S. Forest Service
Department of Energy
* Bonneville Power Administration
Department of Interior
Bureau of Indian Affairs
Bureau of Land Management
Boise Field Solicitors Office
Bureau of Mines
Bureau of Reclamation
* Fish and Wildlife Service
* Geological Survey
Minerals Management Service
* National Park Service
Department of Transportation
* Federal Aviation Administration
*Environmental Protection Agency
National Advisory Council on
Historic Preservation

Elected Officials, State

Honorable John V. Evans
Governor, State of Idaho
Deputy Attorney General,State of Idaho
Senator Denton Darrington
Senator John T. Peavey
Representative Steve Antone
Representative J. Vard Chatburn
Representative Ernest Hale
Representative Mack W. Neibaur

State Agencies

Bureau of Mines and Geology
*Department of Fish and Game
Department of Health and Welfare
  Division of Environment
Department of Lands
Department of Parks and Recreation
Department of Transportation
  Idaho Aeronautics and Public Transportation
Department of Water Resources
Idaho State Clearinghouse
Idaho State Police
Idaho State Sheep Commission
State Historic Preservation Officer
University of Idaho
  Agri-Econo Department
  College of Forestry, Wildlife, and Range
  Extension Range Economist
  Extension Range Specialist

Local Government

Cassia County Commissioners
Cassia County Extension Agent
Cassia County Waterways Commission
City of Burley Parks Department
City of Burley Recreation Department
Mayor, City of Albion
Mayor, City of Burley
Mayor, City of Declo
Mayor, City of Malta
Mayor, City of Oakley
Oneida County Commissioners
Power County Commissioners
Shoshone-Bannock Tribal Council
  Tribal Fish and Game Officer
Twin Falls County Commissioners

Organizations

Albion Telephone Co.
American Fisheries Society
American Mining Congress
Amoco Production Co.
Anaconda Copper
*Atlantic Richfield
Auto Phone Corp.
Belliston Bros. Apiaries
Burley Bowmen
Burley Chamber of Commerce
Burley Highway District
Burley Trap Club
Cassia County Historical Society
Chevron Pipeline Co.
*Committee for Idaho's High Desert
*Conoco Inc.
ESL/UURI
Eugene Television, Inc.
Homestake Mining Co.
Idaho Carey Act Development Assoc.
Idaho Cattlemen's Association
Idaho Conservation League
Idaho Mining Assoc.
Idaho Power Co.
Idaho State Field Trial Assoc.
*Idaho State Historical Society
Idaho Wildlife Federation
Idaho Wool Growers Assoc.
Independent Petroleum Assoc.
Intermountian Gas Co.
League of Women Voters
Magic Valley Trail Machine
Mountain State Telephone and Telegraph
Mt. Harrison Snowmobile Club
National Audubon Society
National Outdoor Coalition
National Wildlife Federation
Natural Resources Defense Council
Northwest Pipeline Co.
Oakley Highway District
*Oregon-California Trails Assoc.
Oregon Trail Muzzleloaders
Pocatello Trail Machine Assoc.
Project Mutual Telephone Coop Assoc.
Public Lands Institute
Raft River Electric
Raft River Highway District
Resource Development Assoc.
Rupert Chamber of Commerce
Sierra Club
Snake River Alliance
South Central Idaho Livestock Assoc.
Southeast Idaho Rod and Gun Club
Texaco, Inc.
The Institute of Ecology
The Wildlife Society
Unity Light and Power
West Cassia Soil Conservation District
Western Land Exchange
Wilderness Society
*Wildlife Management Institute
All appropraite news media

Individuals

Glen Allen
Ken Ames
Mrs. Dick Anderson
Jay Anderson
Neil Anderson
Joe Ballard
Walt Baltzer
Richard Bauer
Bill Beck
Bob Bell
James Bell
Clarence Bellum
Jim Bennett
Sheldon Bluestein
*Mike Boltz
Aldrich Bowler
Patrick A. Bowman
Richard M. Boyd
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Alan Brauer
Adelle Brim
Bud Brinegar
D. Michael Broadhead
Leola Bryant
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Stan Campbell
Bill & Judy Carder
Earl H. Carlson
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Walt and Norma Charles
Dan W. Christopherson
Dick Cook
Angelo Colianni
Tom Coonts
Rich Cone
Roy and Doris Couch
Tim and Erica Craig
C. L. "Red" Cramer, Jr.
R. Hilton Critchfield
Glade Davis
Ivan Dayley
Lindsey W. Dimond
Larry Drexler
Lud Drexler
Mark Druss
James D. Egbert
Vaughn M. Erekson
Jack Erickson
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Thomas R. Flores
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Gregory M. Franzwa
H. Paul Friesema
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Sally Gibson
Kenneth M. Goldsmith
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Jarvis Hazen
Les L. Hazen
William F. Hazen
Toni Hill
Vaughn Hobson
Paula Hollifield
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*Curtis Holmes
Beth & Garr Hovey
Roger Howarth
Marti Howell
Florin H. Hulse
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Jim Ingalls
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Max Kuwana
Ernie LaMiller
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Jackie Johnson Maughn
Ralph Maughn
David Mead
William R. Meiners
Stanley D. Melton
Garland Metcalf
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Vernon Miller
Steve Miller
Ed Mitchell
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Cindy Moyle
Lee Moyle
Stu Murrell
Rosella Neddo
Carl Nellis

Carl Nellis
*Lyle Nelson
John C. Nichols
Don Noble
James Norman
*Randall Norris
G. L. "Pete" Olson
Clair Ousler
Jenkin Palmer
Tom Palmer
Robert Parke
Bill Patterson
Marilyn Patterson
Max Pavesic
Robert A. Pettygrove
Ennis Pickett
Mike Poulton
Nick Purdy
Mel Quale
John Quan
Dee Rasmussen
Dallen Reese
Clair & Virginia Rickettes
R. J. Rich
*Glen A. Roberts
*Nick Rokich
Paula Rosa
Fred Rose
Jeff Rupercht
Claude Saylor
Don, Gerald, and Jim Scarrow
Henry T. Schodde
Fred Schmidt
Ivan Schrenk
Lee Sharpe
Jim Sinclair
Andrew T. Smith
*Cleve Smith
Jim L. Sorenson
Bud Stackler
Claude Stevens
H. Robert Stradley
William V. Studebaker
Charles W. Thompson
Charles Trost
Gary Turner
C. L. Twitchell
Neal Twitchell
Jerry Tydeman
Edward Vaughn
Art Ward
*H. Olen Ward
Ron Watters
Don Westfall
Jim Wickel
Blaine Wight
Lanny Willis
Jim Wood
Bessie M. Wright
Callis B. Young
Asiel Zollinger
*Roland Zollinger
Don Zuck
All grazing permittees in the Cassia RMP area.

COMMENTS AND RESPONSE

OREGON-CALIFORNIA TRAILS ASSOCIATION

Officers
President:
Gregory M. Franzwa
Box 42
Gerald, MO 63037
(314) 764-2861
Executive Vice President:
Merrill J. Mattes
5880 W. Plymouth Avenue
Littleton, CO 80123
(303) 979-6067
1st Vice President:
Robert Rennells
Box 746
La Grande, OR 97850
(503) 963-5826
2nd Vice President:
Mrs. Billie Gray
3947 Park Lane
Dallas, TX 75229
(214) 350-0176
Secretary:
John A. Latschar
794 Urban Street
Golden, CO 80401
(303) 234-6103
Assistant Secretary:
Robert D. Tucker
10380 Glennon Drive
Lakewood, CO 80226
(303) 985-6331
Treasurer:
James F. Bowers
456 South Otis St.
Lakewood, CO 80226
(303) 922-6535
Legal Counsel
James P. Johnson
Box 898
Fort Collins, CO 80522
(303) 482-5058
Board of Directors
Roger P. Blair (1986)
710 Shaun Avenue
Cheyenne, WY 82009
(307) 778-7868
James F. Bowers (1985)
E.G. Chuinard, M.D. (1984)
15537 SW Summerfield Lane
Tigard, OR 97223
(503) 620-2744
Gregory M. Franzwa (1986)
Chairman
Trey Gray (1984)
3947 Park Lane
Dallas, TX 75229
(214) 350-0176
Thomas H. Hunt (1986)
950 Old Trace Road
Palo Alto, CA 94306
(415) 941-0815
James P. Johnson (1986)
Stanley B. Kimball (1985)
745 Saddle Drive
Florissant, MO 63033
(314) 831-7673
John A. Latschar (1985)
Charles W. Martin (1985)
411 North 61st Street
Omaha, NE 68132
(402) 556-4488
Merrill J. Mattes (1984)
Robert D. Tucker (1984)
Honorary Board Member
Russell E. Dickenson, Director
National Park Service
Washington, DC

December 26, 1983

DEC 3 [illegible] 83

Mr. Nick James Cozakos
Burley District Manager
Bureau of Land Management
Route 3, Box 1
Burley, ID 83318

Dear Mr. Cozakos:

Thank you for sending OCTA the Cassia Resource Management Plan EIS for our comment.

We respectfully request that all extant traces of all significant pioneer trails in your area be given complete protection, together with relevant historic sites and graves. For example, we hope that any marked graves or rut segments can be protected from livestock trampling, trail bikers, off-road vehicles, etc. 1-1

We hope, too, that BLM can provide better interpretation at significant historic sites along the trails, such as the "ovens" along Goose Creek, the City of Rocks, and the historic junction of the Oregon and California trails on the west bank of the Raft River. We hope that you can develop some of the sections of the historic trails as hiking segments. 1-2

You may have heard that OCTA has been successful in getting bills introduced in both the House and the Senate to have the California Trail designated as a National Historic Trail. The legislation will include not only the Fort Hall road up the Raft River, and the Salt Lake Cutoff which joins it at the City of Rocks; but the Hudspeth Cutoff, which you do not seem to have addressed in your report. 1-3

If the bills become law, and we see no reason at this time why they won't, the National Park Service will undertake an intensive survey of those routes over a two-year period, map them, and include their recommendations in a report to the Congress.

We feel very strongly that you should include the Hudspeth Cutoff in your deliberations, as it carried far more traffic than did the "main" road south from Fort Hall. 1-3

OCTA has always tried to be reasonable in determinations such as this. We are strongly in favor of Sub-alternative D, which gives complete protection to the cultural resources, with Alternative D as a second choice.

However, we realize that BLM must continue its good relationship with ranchers and other economic interests, so we will not strongly oppose your "Preferred Alternative C." We do oppose Alternatives A and B strongly, but we can go along with C provided you protect the cultural resources as stated in the second paragraph above.

Again, we thank you for allowing OCTA to participate in your planning.

Cordially,

Gregory M. Franzwa
President

Response to Letter No. 1

1-1 The remnants of significant pioneer trails will be managed in accordance with the resource guidelines listed on page 18. BLM is mandated to preserve and protect cultural resource values by numerous laws and regulations, including the National Historic Preservation Act, 36 CFR 800 and the Programatic Memorandum of Agreement (PMOA) between BLM, ACHP and the National Conference of SHPOs. The protection of rut segments from livestock trampling, trailbikes and off-road vehicles is not always feasible. Most of the rut segments have been used continously since the mid-nineteenth century, first by wagons, then by motor vehicles, and as a consequence, are not in pristine condition. Appropriate buffers, generally 330 feet along each side of a segment, are routinely utilized when surface disturbing activities are proposed in the area of a segment.

1-2 Interpretation and development of historic sites associated with pioneer trails is a high priority within the recreation program. The Milner Bicentennial site and associated tract markings are examples of efforts to interpret historic sites. Recommendations for the City of Rock Area are currently being prepared. The Oregon Trail segment in the Highway Unit is identified in every alternative as a Management Sub Area that will require further, more detailed planning (see page 47). This is in line with National Park Service Recommendations for the segment. The development of two small interpretive sites overlooking the junction of the Oregon and California Trails has been mentioned.

1-3 The Hudspeth's Cutoff is mentioned on page 72 as one of the four major emigrant trials within the RMP area. The cutoff crossed the Raft River Valley and, as a result, has been severely impacted by agriculture. BLM has approximately seven miles of Hudspeth's Cutoff segments in the Raft River Valley and Jim Sage Management areas. However, these segments are generally short and interrupted by stretches of private land. Because of their scattered distribution, the segments are not good candidates for development or interpretation. They will however, be given full protection under the cultural resource manadates mentioned in Response 3-1.

U.S. Department of Transportation
Federal Aviation Administration

Northwest Mountain Region
Colorado, Idaho, Montana, Oregon, Utah, Washington, Wyoming

17900 Pacific Highway South
C-68966
Seattle, Washington 98168

JAN 1 [illegible] 1984

Mr. Jimmie L. Pribble
Snake River Resource Area Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Pribble:

We have reviewed your draft environmental impact statement for the proposed Cassia Resource Management Plan and do not foresee any impact on aviation or its activities.

Thank you!

Sincerely,

Joseph W. Harrell
Policy & Planning Officer

conoco

E. Fred Birdsall
Public Lands Coordinator

Conoco Inc.
555 17th Street
Denver, CO 80202
(303) 291-6123

January 17, 1984

Mr. James Pribble, Area Manager
BLM - Snake River
Burley District
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Pribble:

Re: Cassia RMP/DEIS

While I would have preferred Alternative B on economic grounds, I have only modest argument against Alternative C, your preferred approach. The difference between the two lies almost entirely in the acreage withdrawn for seasonal closure. Your plan explains that this is primarily for mule deer winter range and sage grouse strutting. There, of course, exists the possibility that oil and gas in extremely high potential areas could outweigh the deer/grouse values. You appear to have provided for resolution of that potential conflict on pages 15 and 16, and I cannot quarrel with your provision.

Yours very truly,

E. Fred Birdsall

jil
cc:
Alice Frell

Wildlife Management Institute
Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

BURLEY
DISTRICT OFFICE
JAN 19 8 4 '84

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

January 19, 1984

Mr. Nick James Cozakos
District Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Cozakos:

The Wildlife Management Institute is pleased to comment on CASSIA RESOURCE MANAGEMENT PLAN, CRAFT ENVIRONMENTAL IMPACT STATEMENT, Idaho.

The plan is not a plan; rather it is a statement of goals with no details on how they will be achieved or what the cost will be to the taxpayer. Since there are no details on how wildlife habitat will be improved, only that there will be land treatments in winter range and land disposal in winter range. We find the plan unacceptable for wildlife.

Overall, the document is basically another exercise to avoid livestock reductions by doing some unspecified good things and increasing the subsidy to the already heavily subsidized permittees.

4-1 A basic question centers on the relationship between the proposed action (Alternative A, no change) and the preferred alternative (Alternative C). Which is the most likely to occur? Will the final decision be a collection of bits and pieces of all alternatives recombined in a program the public has had no chance to review?

4-2 Appendix B shows only proposed seasons of use. No grazing systems are prescribed. Nor are fencing or water developments for such systems and range treatments specifically proposed. How can the statements that various resources will be "maintained and improved" be valid - when there are no treatments, improvements or livestock reductions proposed in Alternative A? How can Alternative C "maintain and improve" resources, when all details are omitted and the initial stocking rate will increase 8 percent?

DEDICATED TO WILDLIFE SINCE 1911

Fees collected for the present grazing are far below the cost of administering that grazing. How can further budget deficits incurred by large-scale range improvements be justified?

Preferred Alternative C will treat up to 62,150 acres and create 15,958 new AUM. Assuming a conservative $75 cost for each new AUM, the cost would be $1,196,850 excluding fences and water development. This would be $8,142 subsidy for each permittee. The $1.40 per AUM grazing fee would be far below the interest paid by the taxpayer on the government debt for creating that AUM.

The wildlife damages of Alternative B and C are clear. Alternative C, the preferred alternative, proposes to treat 26,000 acres of only 73,000 acres in crucial deer winter range (page 93). Alternative C also proposes to dispose of 3 percent of the land in crucial deer winter range, labeling this "inconsequential". (Page 95). We suggest you cut the size or forage for livestock on any allotment by 3 percent and find how "inconsequential" those users view the matter.

On Page 75, we are shown that all cattle operators lose money when the cost of family labor is applied to their cash return.

On Page 76 there is a good discussion of the AUM values of BLM grazing permits. No information is presented on the AUM value on the Burley district.

4-3 A statement is made that the Alternative C forage allocations will satisfy long-term state wildlife goals. What are those state goals?

4-4 There are only 189 acres of riparian habitat on the Cassia Resource Area. Any acceptable wildlife plan must provide for fencing the bulk of this as an initial wildlife restoration activity.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:msm

U.S. GEOLOGICAL SURVEY
MENLO PARK
JUL 9 1984
LIBRARY

Response to Letter No. 4

4-1 The final decision on the alternative to be selected will be based on the analysis contained in the Final EIS. A decision document outlining the management direction for the Cassia RMP will be prepared and made available as soon as a decision is reached. If this decision is a collection of bits and pieces of all alternatives the public will have a chance to review and make additional comments.

4-2 Alternative A of Appendix B lists the existing season of use. Alternative A would be administered according to the existing land use plan which allows for coordinated management planning to be applied. Alternative C provides for implementation of both grazing systems and range improvements including land treatments. A study by Leithead (1960) showed that as a result of grazing management which deferred grazing, an upward change in condition by one class was achieved. This same study indicated a 225 percent increase in beef production as a result of grazing management over an 11 year period.

4-3 The long term goals for big game numbers through 1955 were worked out jointly between Idaho Fish and Game Department and Bureau of Land Management. These goals include an increase of big game AUMs from 10,081 to 14,316 to accommodate an estimated increase in both mule deer and antelope to about 9,209 animals during the peak use period which will be winter for mule deer and spring and summer for antelope.

4-4 Due to the initial expense, unending maintenance and controversial manner of fenced riparian zones, this alternative is being held as a last resort. We recognize the importance of this resource and this plan has set objectives for areas with high values to optimize wildlife habitat and natural flood plain functions in several management areas. With these goals in mind, uses management can be tailored in future site specific plans to realize the desired product, in this case healthier riparian and wetland areas. A monitoring plan will also be developed to track resource progress. If objectives are not approached within a reasonable period of time monitoring will show it and steps will have to be taken then, perhaps fencing.

U.S. DEPARTMENT OF INTERIOR
RECEIVED
JAN 24 1984
BUREAU OF LAND MANAGEMENT
BURLEY, IDAHO

Dear sirs,

After reviewing your Cassia, Resource Management Plan and Environmental Impact - Draft. I would have to agree with your recommendation of Alternative C because of it benefiting almost all interests. However I am concerned about the proposed increase of Antelope from 167 to 721 as we have seen the distruction in the past especially in wheat fields where they bed and run back and forth to water, at harvest time this is disastrous. It would affect me very much as we run about 2500 dryland acres.

5-1 I am not against wildlife as we are wintering about 60 head of deer on our fall grain, which cause very little damage then, but I think we have enough antelope. Thank you Elmo Lantz

Response to Letter No. 5

5-1 The numbers you refer to in your letter refer to AUMs made for antelope. The 167 AUMs represent 130 antelope for 1982, present population, and the 721 AUMs represent 565 antelope proposed for 1995. This increase in antelope is proposed by the Idaho Fish and Game through a transplanting program.

AtlanticRichfieldCompany 555 Seventeenth Street
Denver, Colorado 80202
Telephone 303 293 7577

J. R. Mitchell
Manager
Public Lands Coordination
Government Relations

BURLEY
DISTRICT OFFICE
BUR[illegible]

FEB 6 9 39 AM '84

February 1, 1984

Mr. Jimmie L. Pribble
Snake River Area Manager
Burley District Office
Bureau of Land Management
200 S. Oakley Highway
Route 3, Box 1
Burley, ID 83318

Re: Cassia Resource Management Plan and Draft Environmental Impact Statement, Idaho

Dear Sir:

Atlantic Richfield Company appreciates the opportunity to comment on the Cassia Resource Management Plan and Draft Environmental Impact Statement.

Although management of mineral and energy resources is considered one of nine issues you selected to address in this plan, it was very difficult for us to evaluate the plan due to incorrect, incomplete or nonexistant data that normally are included.

The following are major inadequacies we see in the draft document.

1. The number of acres listed on Page XIV and 114 as impacting energy and minerals is different than those listed on Page 52 for Alternatives A and C. For example:

6-1

	Alternative C	
	Pages XIV & 114	Page 52
Open	134,105	217,279
No Occupancy	5,394	5,038
Seasonal Closure	337,054	256,360

Without accurate numbers to work with, it is impossible for us to evaluate the effects of this plan.

6-2 2. On Page 113, there is a statement regarding the number of acres of low to moderate mineral potential which would be withdrawn from

mineral entry as a result of each alternative. Without a map showing these areas, it is very difficult to comment.

6-3 3. Although we believe the seasonal closure for oil, gas and geothermal resources includes 72,776 acres to protect wintering deer and 21,642 to protect strutting and nesting sage grouse, we were unable to determine from the plan what else makes up the 256,360 or 337,054 acres.

Again, without a map showing the areas to be seasonally closed and when, it is difficult to evaluate the plan.

6-4 We found the Big Game Habitat (Map 3-7) and Upland Game Bird Habitat (Map 3-8) maps inadequate in fully locating these areas. Are all the areas shown on both maps under seasonal closure restrictions?

6-5 4. We had to assume that those areas shown as limited use on Map 2-5 reflected the 5,038 or 5,394 acres with no surface occupancy, however, nowhere in your report do you state that or list those areas by acre and location.

We hope that in your final plan you address the questions and problems we have identified here so we may adequately assess and comment on the energy and mineral resource potential of the Cassia Resource Area.

Sincerely,

Jay R. Mitchell

J. R. Mitchell

JRM:LJW:drm

Response to Letter No. 6

6-1 Acreage figures listed on Page xiv and 114 are correct and acreage figures on Page 52 are corrected in the Text Revisions Section of this document.

6-2 The 19 acres of low mineral potential land withdrawn from mineral entry is Management Area 5 - Administrative Site, shown on Map 2-1 and discussed on Page 24.

6-3 Raptor habitat acreage are also included in the seasonal closures to make up the 337,054 acres.

6-4 Big game habitat (Map 3-7) shown in pink, the crucial deer winter range (72,776 acres), has been identified for seasonal closure. Upland Game Bird Habitat (Map 3-8), shown in green and orange, are the 21,642 acres that have been identified for seasonal closures in the sage grouse range. Sensitive species (Map 3-9) shown in yellow, are also areas that have been identified for seasonal closure in the ferruginous hawk use areas.

6-5 The 5,394 acres of no occupancy is made up of Management Area 1 (Milner), Management Area 2 (Foothills) within 100 feet of streams, Management Area 5 (Administrative Site), Management Area 8 (City of Rocks) within 330 feet of historic trails or inscribed rocks and Management Area 9 (Raft River Valley) within 500 feet of floodplains.

United States Department of Agriculture

Soil Conservation Service

Room 345, 304 North 8th Street
Boise, Idaho 83702

BURLEY DISTRICT OFFICE
FEB 8 8 2 AM '84

February 6, 1984

Jimmie L. Pribble
Snake River Resource Area Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Pribble:

Thank you for the opportunity to review and comment on the draft Resource Management Plan and Environmental Impact Statement for the Cassia planning area of south central Idaho. Our comments are as follows:

a) Appendix D lists erosion rates by allotments comparing the present situation "No Action" Alternative with the "preferred" Alternative C and predicts very little reduction in erosion rates (from 4.1 to 3.8 T/ac/yr.). This does not seem accurate in that also under Alternative C, a reduction of 34 percent fair and poor ecological condition rangeland will be occurring. 7-1

b) Similar concern exists when comparing Map 3-2, existing severe erosion areas designated with Map 3-5, apparent range trend for the same area. While soil changes always lag plant changes, whether conditions are improving or declining, it is only one of several characteristics observed when judging trend. Therefore, especially where trend was designated as upward, a question arises as to possible error in data portrayal.

c) Our major concern then is with "T" values of many of the soils in the Cassia Resource Management Area established at 2-3 tons soil loss tolerance/acre, and proposed reduction of present to preferred rates of 4.1 to 3.8 T/ac/yr. Will management objectives for sustained use of the resource base be achievable? 7-2

d) Although "sub Alternative D" provides for a reasonable reduction in estimated soil erosion rates, it would appear to maximize adverse consequences to the welfare of the agricultural community.

James N. Hobson Actg

Stanley N. Hobson
State Conservationist

The Soil Conservation Service is an agency of the Department of Agriculture

Response to Letter No. 7

7-1. Do not assume a one to one correlation between a change in rangeland condition or trend and a change in erosion rates; i.e., if 34 percent less of the rangeland will be in fair or poor ecological condition under a given alternative, this does not mean erosion will drop a corresponding 34 percent. In this particular case, the reduction in erosion is only seven percent. This is because the USLE uses the average of each allotment as one valuable in estimating soil loss and not the condition class.

7-2. Quantification of rangeland erosion is hard to do because an adequate model does not exist. These erosion figures do not indicate absolute values but are a function of an analysis of the USLE variables on an allotment specific basis. The reviewer should pay attention to the trend between alternatives, in this case a reduction from 4.1 to 3.8 T/ac/yr, which is a viable relationship. We feel that management objectives for sustained use of the resource base will be achieved.

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE. 83702

February 16, 1984

Jimmie Lee Pribble, Area Manager
Burley District BLM
Route 3, Box 1
Burley, ID 83318

Dear Mr. Pribble:

I have had an opportunity to review your Cassia resource management plan, which generally appears to provide a sound analysis. My concern arises from an indication that protection of historic and cultural values would be eliminated for anywhere between 2200 and 2800 acres of emigrant road areas. Such a change would constitute an adverse impact that appears to require Advisory Council comment. If I misunderstand your summary (Table 2-10) on this point, please let me know. 8-1

Sincerely,

Merle Wells

Merle W. Wells
State Historic Preservation Officer

MWW:dac

BURLEY DISTRICT OFFICE
FEB 1[illegible] 8 [illegible] AM '84

Response to Letter No. 8

8-1 The figures listed in Table 2-10, with the exception of the 3,360 acres in Alternative A, are based upon the acres within Management Areas or Management Sub Areas. They do not necessarily reflect the actual area to be protected for cultural values. The acreages for Management Areas or Sub Areas in which cultural resource protection will be emphasized are listed. As an example, in Alternative C, 27,268 acres in the West Goose Creek Management Area are designated for management to protect significant cultural values. This does not mean that there can be no ground disturbance within the area. It means only that management practices within the area will emphasize the protection of cultural values. The 3,360 acres listed for Alternative A are based on 42 miles of segments with a 330 foot buffer on both sides (42 x 5280 x 660 - 43,560 number of square feet). These segments will continue to be protected as noted in Response 1-1. However, because they are not all discrete Management Areas or Sub Areas, they do not appear in Table 2-10.

U.S. DEPARTMENT OF INTERIOR
RECEIVED
1984
BUREAU OF LAND MANAGEMENT
BURLEY, IDAHO

FEB. 27, 1984

Mr. Pribble :
Dear Sir :

This is a letter of protest against your proposal change of my turn out date on Antelope Springs Allotment from May 1 to May 20. Reasons againts whange are as follows ; I have spent in access of $ 15,000. on a law suit with Ray Johnson to prove my right to water at Butler Springs. The District Judge rulled in my favor, but Johnson appealed to the higher court. My Lawyer tells me tere is nothing to worry about as the hearing went good. They had the hearing on Dec. 9, 1983, but the State Judge hasn't made a decision yet. Having the use of the range around Johnson's dry farm and the area north would ,and has before taken the pressure off the high range around Antelope Springs. There is a lot of cheat grass in this area up from Butler Springs that can be used early, but it isn't much good latter, after it gets dry. Other Ranchers in the area comparable with this unit go out some of them even before May 1, Such as Jim Powers, Don & Ray Johnson, and the Anderson unit was used this way when Bud Johnson had it . It was suggested I take my cattle over to Sublett and put them on my private ground for the first part of May ; then bring them back to Antelope Springs for 20 days before I go on the forest. That may sound easy figuring it on paper or looking at the map. But it takes several days to gather that many cattle and move them in that rough terrian. Also to move cattle every 3 weeks is hard on the cattle as well as time consuming and costly. Maybe a rotation between the two areas should be looked into One of the two men I met with made the statement that he had never been on Antelope unit He made his decision by looking at the map and figuring the elevation. It is proposed that I use these A U MM' s in NOvember, but that is a heavy deer hunted area, witha access only by horses. So by Oct. 25 , the deer hunters have the cattle chased out th through out fences and gates that are left open. It would be impossible to make the se cattle stay there that late. I think we could work out a better solution than has been proposed, especialy if Butler Springs is again made available to the unit.

Lyle Nelson
Malta Idaho

livestock use level of 79000 AUMs may be higher than needed. It may also be higher than feasible given the declining trend in 8100 funds the past few years. I would suggest that the range improvement money be used to mitigate existing multiple use conflicts in support of active preference, with long-term increases given where land treatments do not conflict with watershed and wildlife habitat goals. Probably riparian habitat will have to be fenced out. Also I wonder if allotment combination and adoption of rotation grazing systems would not be an alternative to ~~changes~~ in delays in turnout date?

Sincerely,
Mike Boltz

10-1 P.S. Which lands do you propose to acquire by exchange and how will these help meet the goals of the plan?

DIST[illegible]
MAR [illegible]

Comments on the Cassia RMP

Thank you for the opportunity to comment on the RMP. I've seen portions of the area and found them quite interesting. I want to express support for the Bureau's preferred alternative for the following reasons;

- Alternative A would not mitigate existing impacts of livestock grazing on important multiple use values. Based upon several visits to portions of the area I can certainly agree that multiple use values are great on many of the effected lands.
- Alternative D would forgo some beneficial aspects of livestock grazing upon native and seeded herbaceous species, namely seed planting and removal of dead material, although plants presently in poor vigor would recover in the short-term. Without land treatments it is doubtful that manageable stands of perennial grass could be restored in a reasonable time, even with greatly reduced grazing pressure.
- Alternative B would require considerably greater investment in range improvements to support the higher level of livestock grazing, and it appears ~~that~~ from perusal of your maps that the improvements would have to be at the expense of wildlife habitat to an even greater degree than that shown by your impact analysis. It is also possible, if not probable, that allotments would have to be combined in order to get enough area for implementation of rest-rotation grazing systems in order to maintain desirable vegetation under higher use levels.

Alternative C appears to be the most balanced use proposal. However, given that you are already satisfying active preference on a unit-wide basis, and that the area has high multiple use values, it appears that the proposed long-term 30

Response to Letter No. 10

10-1 The Cassia RMP does not specifically identify private lands for acquisition. However, the lands identified in the plan are included within the 21 exchange proposals on file. Each of these exchange proponents has offered certain private lands in return for an equal value of public land. Each parcel of private land is yet to be evaluated for its public value or for its contribution toward meeting the goal of the RMP. Acquisition of private land is generally made to block public land ownership patterns into more economic and efficient management units. Exchanges are also made to acquire other public values such as important wildlife habitat, recreational values, or public access routes.

None of the ALTERNATIVES would be my selection. Alternative "C" is closest, however.

I disagree with increasing grazing, and I believe restraint should be applied to any additional development of mining.

In both of these areas, greater benefit is realized by fewer people -

Grazing leases are really unfair - They allow cattle raisers (companies) to produce beef cheaper than others that must raise or purchase feed - RAISE THE PRICES - and/or put the leases up for auction each year. Advertise the auction!

The management program should be aimed toward benefiting the most individuals - not big companies - and not for the greatest income to BLM

(1)

US DEPARTMENT OF THE INTERIOR
RECEIVED
MAR 6 1984
BUREAU OF LAND MANAGEMENT
BURLEY, IDAHO

2-10-84

Dear Sirs;

I wish to commend you for putting together the Cassia RMP. I found it to be very easy, simple to read & understand. I agree that alternative C is the best way to go for all the various interests. I have a few questions and suggestions on it.

The first is that all though the book you talk of Special Management of ~~social~~ critical riparian & floodplains but nowhere in it does it describe what this special management would be. If you are talking about fencing these areas I would like to state my opposing to it because you would either have to leave part unfenced which would put more erosion pressure on these areas or you would have to pipe the water into troughs and this would

12-1

(2)

lead to erosion losses through soil compaction that you mention on page 77 so this seems to me to be a no win situation.

On page ix you mention that 5 special recreation ~~areas~~ management areas totaling 56,137 acres would be established but in reading the rest of the book I couldn't find where these would be and how many acres in each area.

12-2

Starting on pg. 61 you tell of flooding the first type being spring run off which you say you really couldn't do much about And the second is the thunderstorms which you feel you could handle it by leaving enough organic matter. Speaking by our experience if you cannot leave enough forage to handle ~~ton~~ some of these storms as we had

12-3

(3)

a crop of barley destroyed by one of these storms which knocked the barley over and deposited a foot of mud on top of it. Beside on the runoff type of flood you state that most of the water originate ~~off of~~ on forest & private lands and you leave the impression that you can't do much about it well in looking it over I see no difference in the origen of the 2 types of floods.

On page 70 you are recommending more ponds like those in the warm Creek allotment well as a permittee in that allotment I would recommend the other allotments not put in the fenced ponds unless there is a signed agreement on who would be have to maintain the troughs and fences. we understood that we wouldn't be responible for all ~~of~~ of these but now it seems that we have

31

(4)

inherited them.

I have to disagree with your thought that snow machine use will not increase significantly over the next ten years. Living in Sublett we see a steady increase in use year after year & we see no reason this trend will not continue.

I also see a problem under alternative C in that it calls for a 335% increase in antelope numbers. I do not see how this can occur because antelope have a hayday in the private lands and we as landowners can not afford what they do to our crops. Besides certain individuals will hunt the antelope no matter if you have a hunting season or not and these individuals will see to it that the ~~no~~ numbers will never increase.

12-4

(5)

On your season of use you have cut our allotment out of the April 15 to May 1 use without telling us why I asked Mr. ~~Pratt~~ Pubble why and he couldn't tell me he said he would ~~tell~~ investigate further and let me know but as of ~~now~~ Feb. 10, 1984 I having received an answer yet.

12-5

I also would like to put in writting my opposition to transfering alot of BLM acres into private land ~~holders~~ Because this would just go to certain big land holders and put the rest of us out of business.

On Map 3-3 in R27 T.12 you show an area with pinyon pine there is no pinyon pine in this area.

12-6

On the same R+T on map 3-10 there is a Class 5 Visual Resource, we don't know what this is unless it is a ~~good~~ trash dump but we don't know for sure

12-7

(6)

On map 3-11 the ~~Comm~~ gravel pit in R28 T12 is not a Community pit it is a Sand and Gravel FUPS only. the pit in R27 T12 that is in the North is a Community pit but is not marked as one.

12-8

Thank You for taking the time ~~for~~ to read my comments.

Thank You

Roland L Gallenger
HC61. Box 1104
Malta, Idaho 83342

Response to Letter No. 12

12-1 The special management of these areas is briefly covered in the alternatives section, Pages 29-47. Floodplains are addressed in Alternatives B through D in Management Areas 3 and 9, while wetland/riparian areas are provided protection objectives ouside critical floodplains in Alternatives C and D in Management Areas 2, 3, 4, 7, 8, 9, 10, 11, and 13. It should be noted that this plan establishes management direction and leaves site specific actions to future, detailed plans. The fenced protection of waterways is not a part of the proposal action.

The monitoring plan on Pages 165-166 covers the studies to be applied at these sites, so that progress toward meeting these objectives can be evaluated. If monitoring reveals that floodplain and riparian wetland objectives are not achieved, other approaches, including fencing, would be considered.

12-2 The five special recreation management areas are within the following Management Areas: Milner, City of Rocks, Jim Sage, Cotterel Mountain and Oregon Trail.

12-3 The difference in the two types of floods are soil conditions. Spring runoff involves frozen or water saturated soils. Conversely, thunderstorms ofter occur with dry soil conditions where organic soil cover not only shields the soil surface from the intense raindrops barrage, but also tends to hold the moisture and soil in place, thereby encouraging the waters infiltration. The more open and uncovered a native soil becomes, the more water and soil it sheds. Even if treated the condition can perpetuate itself and desertify the landscape. In general, all other factors equal, vegetative cover is the only component of rain caused flood that can be manipulated by land managers.

12-4 The increase in the antelope number is propoped by the Idaho Fish and Game Department through a transplanting program. Our planning indicates we can supply the necessary forage for such animal numbers while those antelope are on public land.

12-5 The Warm Creek Allotment #5320 is split by Interstate 84. The west portion of the allotment has an April 15 turnout date while the east portion has a May 1 turnout date. The May 1 date was inadvertantly put on the Season of Use Table. The season of use has been corrected to show April 15 to December 30. (See Text Revision Section.)

12-6 Statement about Map 3-3, T12S, R27E., that shows pinyon pine is there, is incorrect; it should be shaded blue with hatch marks indicating Wyoming big sagebrush/mountain big sagebrush/basin big sagebrush.

12-7 Class 5 visual resource on Map 3-10 that you have questioned is an unauthorized dump site.

12-8 Your statement about Map 3-11 is correct. (See Text Revision Section.)

BARRUS & BYWATER
ATTORNEYS AT LAW

March 5, 1984

Jim Pribble
Bureau of Land Management
200 South Oakley Highway
Burley, Idaho 83318

RE: Jil Mock - Petition for Reclassification

Dear Jim:

Enclosed herewith is a Petition for Reclassification of Land pursuant to your Cassia Resource Management Plan. This request pertains to a very small portion of the land in your plan, but we feel it is a very important and needed change in the plan.

Your consideration will be greatly appreciated.

Very truly yours,

BARRUS & BYWATER

By _____
Alfred E. Barrus

AEB:clb
Enclosure
pc: Jil Mock

Alfred E. Barrus/Stephen A. Bywater
Howard D. Smyser, Associate
P.O. Box 487 □ 1918 Overland Ave. □ Burley, Idaho 83318 □ Telephone (208) 678-1155

PETITION FOR RECLASSIFICATION

JIL MOCK, a divorced woman, by and through her attorney of record, Alfred E. Barrus, hereby petitions the Department of Interior through the Bureau of Land Management, Burley District, for the reclassification of the following described lands, to-wit:

TOWNSHIP 12 SOUTH, RANGE 21 EAST, BOISE MERIDIAN, Section 29, the N½NW¼, SW¼NW¼, consisting of approximately 120 acres, more or less.

Despite very strong objections, the subject property was declared unsuitable for desert land entry by the Bureau of Land Management on July 31, 1978. This property is treated as an isolated tract and the reason given for the United States Government to retain ownership is because such land can be used to increase non-game and upland-game populations by improving food, water and cover for said wildlife.

This particular parcel of land is located within one-eighth of a mile of other public lands on three (3) sides, and there are thousands of acres of public land in the near vicinity. Water is available to irrigate the subject parcel of land making its development extremely feasible.

Under the regulations of the Bureau of Land Management, when land can be retained for multiple use, where it is appropriate for disposal, there are two (2) criteria to be considered:

(1) the relative scarcity of the values involved and the availability of alternate means and cites for realizations of those values; and

(2) long-term public beneifts.

As to criteria number (1), there is absolutely no scarcity of land for use as wildlife habitat in that immediate area. As stated above, there are literally thousands of acres in the immediate vicinity of the above-described land that would be suitable for pheasant habitat and these lands are already classified for that purpose by the Bureau of Land Management. On the other hand, suitable land for agricultural purposes, especially those that have water available, are extremely scarce.

The long range benefits of allowing the property to be used for agricultural purposes by the private sector are many. If this land were allowed to go to the private sector, taxes would be assessed beginning with the first year of production and this tax money could be utilized by Cassia County. Other benefits would be the production of food and increased employment.

For these reasons, it is respectfully requested that the above-described land be classified for agricultural purposes.

DATED this 6th day of March, 1984.

BARRUS & BYWATER

By _____
Alfred E. Barrus
Attorney for Jil Mock

United States Department of the Interior
NATIONAL PARK SERVICE
Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

IN REPLY REFER TO:
L7619(PNR-RE)
DES 83/74

March 8, 1984

Mr. Jimmie L. Pribble
Snake River Resource Area Manager
Bureau of Land Management
Burley District Office
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Pribble:

We have received the Draft Cassia Resource Management Plan and Environmental Impact Statement. We were most interested in Management Area 8, City of Rocks.

Your discussion of this area accurately reflects the interests of this agency, and we concur in Alternative C, wherein it is stated, "The outstanding scenic quality of the City of Rocks would be protected via management objectives that would exclude future landscape modification from fences, powerlines, and land treatments."

Thank you for the opportunity to comment on this plan.

Sincerely,

Richard L. Winters

Richard L. Winters
Associate Regional Director
Recreation Resources and
Professional Services

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

In Reply Refer To:
WGS-Mail Stop 423

MAR

Memorandum

To: Snake River Resource Area Manager, Bureau of Land Management, Burley, Idaho

From: Assistant Director for Engineering Geology

Subject: Review of draft environmental statement for Cassia Resource Management Plan, Burley District, Idaho

We have reviewed the draft statement as requested in your notice of December 5.

15-1 The list of criteria used in determining areas available for sanitary landfills should include ground-water quality (p. 15). For example, areas with highly permeable cover and relatively shallow depths to ground water would probably not be suitable. Proximity to wells and springs downgradient from a proposed landfill site should probably exclude that site from further consideration.

15-2 The potential for ground-water impacts from chemical treatment of vegetation should be recognized and mitigation should be proposed or discussed (p. 22).

for James F. Devine

Response to Letter No. 15

15-1 I agree on landfill comment (see Text Revisions).

15-2 I agree with the comment concerning contamination of ground water from chemcial treatment of rangeland (see Text Revisions).

BURLEY
DISTRICT OFFICE

MAR 1984

PICKETT RANCH & SHEEP CO.

Box 80, Marion Road • Oakley, Idaho 83346 • (208) 862-3482

March 8, 1984

To: Jimie L. Pribble, Snake River Resource Area Manager
Bureau of Land Management
Burley District, Idaho

Re: PREFERRED ALTERNATIVE UNDER SEPTEMBER, 1983 DRAFT OF THE CASSIA RESOURCE MANAGEMENT PLAN.

Dear Mr. Pribble, et al.:

In response to your 1983 draft of the Cassia Resource Management Plan, Pickett Ranch & Sheep Company, hereinafter "Permittee," requests implementation of Alternative No. C. Permittee specifically disfavors the proposed disposal of public lands situated in Township 13 South, Range 21 East and Township 12 South, Range 21 East, known in your 1983 draft as "Foothills."

The Foothills provide healthy environment for livestock during the spring and late fall seasons of the year. Map 3-4 of the draft classifies the range condition of a major portion of this area as "poor." Permittee fails to see the propriety of such a classification for early spring and late fall grazing considerations. Spring grass grows early and allows removal of livestock from feedlots before range in higher elevations is ready. The economics of early removal is apparent. Good spring range is in short supply for livestock producers in this part of the district.

Late fall grazing in this area also provides valuable grazing. The area is well sheltered for bad weather and allows healthy, open space close to ranch headquarters. Although the grass stand may fit the general description of "poor" under BLM standards, when all factors are considered together, the Foothills area provides a very valuable

resource to Permittee's grazing operations.

The value of this rangeland to Permittee's particular needs is compounded when consideration is given to its livestock trailing necessities. Removal of livestock to and from the Hammond Butte area (where Permittee owns about 7000 acres of pasture in fee) and from the Dry Creek area on which Permittee holds grazing privileges, necessitates accessibility to the "Foothills" in order to rest livestock while trailing. During removal, lambs are normally tired and in need of rest when this area is reached. Sage brush usually retains adequate moisture in the ground to preserve sufficient tender grass to allow lambs to rest and fill. But even under present conditions, livestock weight is lost during these trailing periods. Unless these lands are held open, the feasibility of trailing livestock to southern ranges will be seriously curtailed.

Permittee has seeded a portion of this area to wheatgrass and has acquired its northern pastures in reliance on continued accessibility to the Foothills area.

As a concerned citizen, Permittee also questions the prudence of disposing these lands. Permittee and other local farmers claim a vested property interest in certain rights-of-way through the Foothills to operate and maintain a ditch which carries spring run-off from Cottonwood Canyon in several directions over this area. 43 USC § 946; see also P.L. 94-597, Title VII, § 706(a), 90 Stat. 2793. Although BLM is permitted to transfer out of Federal ownership any lands covered in whole or in part by a right-of-way, it must elect between conveying subject to the right-of-way and retaining Federal control over the right-of-way to assure that its purposes and terms will be carried out. 43 USC § 1768.

The diagonal directions in which these ditches run,

the shortage of water, the poor soil conditions, and various other considerations all combine to mitigate against the likelihood of successful farming in this area. Permittee contends that the most economical use of this land is its present use.

Permittee has complied with the rules and regulations laid down by the Secretary of the Interior, has paid all permit dues in a timely manner, and has demonstrated good faith and reasonableness in all management practices on these lands. It does not request any new or additional privileges, only that the value of its grazing unit and the practicability of its ranching operations not be impaired.

Respectfully,

Pickett Ranch & Sheep Company

By Ennis Pickett

Ennis Pickett, President

The 1977 grazing season was a drought year and range forage for grazing was critical. As proof of this I reference your letter to permittees dated August 16, 1977 wherein you state, "As you are aware, the adverse effects of the drought this year on livestock water and forage production will be felt more as the grazing season progresses. For this reason, we are asking that licensees be alert to the fact that grazing may need to be terminated earlier this fall than the normal closing date."

17-3 A section noting the adverse climatic conditions during the study is necessary as was emphasized by permittees in the public involvement meetings held in early 1983. It seems you have chosen to ignore the permittee comments at these meetings. A caveat concerning the climatic conditions and study results is pertinent to a correct and an impartial evaluation of the grazing use. I request this addition be incorporated in your study.

I prefer implementation of alternatives "B" or "C". Either alternative is acceptable. Alternatives "D" and "sub D" are quite impractical and politically unacceptable. A good balance is alternative "C"; BLM's favored management approach.

Thank you for the opportunity to respond to the Cassia RMP draft EIS.

Sincerely,

H. Olen Ward

H. Olen Ward

BURLEY DISTRICT OFFICE MAR 15 9 2 PM '84

7209 Kingston Drive
Boise, Idaho 8370
March 14, 1984

Jimmie L. Pribble, Snake River Resource Area Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Pribble:

Following are my comments on the Cassia Resource Management Plan, EIS dated September, 1983.

1. Proposed forage use tables in Appendix A understates present livestock grazing use on some allotments. The understatement of grazing use is a result of unauthorized use by permittees in years prior to 1981 which were not reported. Loose management by the administering agency and prior customary grazing practices allowed this improper use practice to exist in years past. Although failure to report additional grazing use appears to have been corrected it has skewed the data base and given an improper picture of present use. This has also resulted in an understatement of proposed use in all alternative scenarios.

17-1 Although difficult to quantify this error and make appropriate adjustments it is no impossible to do so. The last 3 years of licensed renewable and supplemental non-renewable use is a better measurement of past average use and should be used in lieu of the 6 year period of record which you used in your study.

I am confident field men that monitor grazing use would be able to provide this information with a minimum of time and effort. This error needs to be corrected and a reevaluation of present and proposed forage use adjusted to reflect this change.

2. No where in the EIS did I find a discussion of climatic conditions in the spring and summer preceeding the collection of the vegetative cover which is a critical element in the evaluation.

17-2 According to your precipitation records for the Jim Sage Unit and contiguous units which you provided to me by letter dated March 28, 1983, the annual precipitation for the Jim Sage Unit and contiguous units the year the field work was completed apparently was above the average. However, the cold temperatures in the early spring and the irregularity of subsequent precipitation is often the overriding factor affecting grazing conditions on the range. The 1981 season was one of those years.

A good example of this was the 1977 season when April, May and June precipitation was relatively high as it was in 1981. In both the 1977 and 1981 grazing seasons very poor range production conditions existed.

Response to Letter No. 17

17-1 Six years of use will provide data that presents a more uniform average of climatic factor impacts on forage production. As a result a more accurate initial stocking level will be achieved by using the average of six years of use to determine the initial stocking level.

17-2 According to National Oceanic and Atmospheric Administation (NOAA) Climatological Data for Idaho, data from the Strevell Recording Station indicates an average +2.15°F departure from the normal for the months of March, April, May, and June. Data from this same publication indicates the Malta Recording Station had normal temperatures during the months of March, April, May, and June.

17-3 Data from NOAA indicates that 1981 was normal or above normal for both precipitation and temperature through early summer. Bureau instructions prohibited the use of one-time production data to suggest proposed grazing use. Therefore, this was determined by using six years average use, condition, trend, utilization, and climatic data.

IDAHO FISH & GAME

Region 4
868 E. Main, P.O. Box 428
Jerome, Idaho 83338
Telephone: (208) 324-4350

March 15, 1984

Jimmie L. Pribble
Snake River Resource Area Manager
Bureau of Land Management
Route 3 Box 1
Burley, ID 83318

Dear Jimmie:

We have reviewed the "Cassia Resource Management Plan Draft Environmental Impact Statement" and offer the following comments.

We object to the proposed implementation of Alternative C (Preferred Alternative) for the following reasons:

1. Alternative C provides for livestock use at rates 34 percent greater than the existing situation. Increased livestock use would be accommodated by increased forage production resulting from land treatments. Statements on page 95, paragraphs 4 and 5, include "The resource management objectives under Alternative C are, for the most part, generally favorable toward big game."; and "Under this management concept mule deer would fare well even though 17 percent of deer winter range is proposed for some kind of land treatment." Land treatments (usually brush eradication) of this magnitude on mule deer winter range will have a major negative impact on mule deer populations on the resource area. Projected 1995 mule deer population levels are not a realistic goal under this alternative. The Alternative C goal of achieving habitat diversity by eliminating brush on mule deer winter range can not be considered valid. 18-1

2. A discrepancy exists on page 95, paragraph 5. Lines 2-3 indicate that "17 percent of deer winter range is proposed for some kind of land treatment" and yet line 7 states "Important areas of hiding, winter or escape cover such as ridgetops and draws would be avoided." 18-2

3. The statement on page 95, par. 7 notes "the proposed land treatments in mule deer winter range would provide additional forage to support both wildlife and livestock increases. This forage increase would reduce the utilization on browse species and would eliminate much of the mule deer-livestock competition on crucial deer winter range." Land treatments which eliminate browse species on deer winter range

EQUAL OPPORTUNITY EMPLOYER

can not be construed as providing additional forage to support wildlife increases. Elimination (treatment) of browse to produce additional forbs and grasses and reduce livestock use on remaining browse species is a questionable practice. Browse species will continue to be used by livestock despite forb and grass increases because as stated on page 91, paragraph 3, "during late season grazing, livestock shift to browse species as grasses and forbs dry, mature, and lose their nutritional value." The elimination of fall-winter livestock grazing on mule deer winter ranges is the best technique for minimizing competition. 18-3

4. Aprpoximately 18 percent of yearlong antelope range is proposed for land treatment. Treatments that increase forb production on antelope summer range should increase carrying capacities. However, treatments which decrease shrub coverage on winter range and fawning areas may be detrimental to antelope populations.

5. The increase in numbers of livestock on these ranges (Alternative C) will create wildlife displacement which has not been adequately addressed.

6. The potential land disposal of two percent of the mule deer winter range should not be considered as "insignificant" since these areas are critical to these species.

7. Land treatments are scheduled for 24 percent of sage grouse habitat. Brood rearing habitat in some areas could be improved by treatment if forb production is increased. However, sagebrush treatments are generally detrimental to sage grouse nesting and winter habitat. On page 99, paragraph 1, "Improvement in sage grouse habitat provided by land treatments would offset the additional livestock use on wetland/riparian areas." If sage grouse habitat was improved by treatment, the wetland/riparian areas would still be critical brood rearing areas, particularly in drought years. 18-4

8. On page 55, Upland Game, Alternative C, "Riparian areas would continue to produce food and cover for upland game at a level well below optimum." The limited amount of riparian habitat (189 acres on the resource area) and the critical value of the habitat to fish and wildlife dictates that these areas be fenced from livestock grazing. 18-5

9. As stated on page 56, Alternative C, "the treatment of an additional 82,176 acres would have an adverse effect, particularly on the prey base for the ferruginous hawk." The impact of these treatments on other raptor species would also be detrimental. 18-6

10. Management of roadless areas and natural areas such as Jim Sage Mountain would not be provided for under Alternative C.

Although Sub Alternative D (No Livestock Grazing) would ultimately provide the greatest benefit to the wildlife resource, we feel that this alternative is socially and politically unacceptable and is not a viable alternative at this time.

We recommend the implementation of Alternative D. Adequate forage would be provided for the projected 1995 wildlife populations. All deer winter range and yearlong antelope range would be maintained or improved. Forage competition between livestock and deer on crucial deer winter range would be substantially reduced. All upland game and sensitive species would benefit due to the 23 percent decline in livestock grazing. Hunting opportunity would be expanded from current levels. Jim Sage Mountain would be restricted to non-motorized recreation opportunities. Riparian/wetland areas, and water quality would improve substantially. Soil erosion would be reduced.

In conclusion we are concerned that if the Preferred Alternative (C) is implemented without modification, impacts will occur to fish and wildlife resources that would be in conflict with the multiple use sustained yield concept. We request that consideration for the concerns we have expressed in our comments be evaluated in making the final decision.

Sincerely,

Robert L. Beal

For William E. Webb
Regional Supervisor

pc: Bureau of Wildlife
Bureau of Program Coordination

Response to Letter No. 18

18-1 The EIS document provides for assigning adequate forage to meet the 1995 projected mule deer populations. This will result by eliminating undesirable browse species. If seedings are to follow the land treatment, the species mixture to be seeded will be carefully considered for including beneficial wildlife species.

18-2 Land treatment proposed for 17 percent of the deer winter range does not mean eradication of the total amount of brush in that 17 percent. There are many areas where the brush has out-grown its usefulness for big game forage. Land treatments proposed in these types of areas, planned with wildlife in mind and seeded to a mixture of preferred plant species will enhance the areas for big game. This also applies to the 18 percent of antelope range that has been proposed for land treatments. Knowledge of the required habitat needs for both mule deer and antelope will be incorporated into the planned projects in a cooperative effort between the BLM and the Idaho Fish and Game Department.

18-3 Livestock dietary preference is mostly grass. As a result of the proposed land treatments, a much greater percentage of the forage produced would be grass, therefore, the livestock dietary preference of grass can be met later into the season before shifting to browse. Livestock utilization on browse should be reduced when compared to the non-treatment proposal.

18-4 The land treatment on 24 percent of the sage grouse habitat would be done on areas where it would most benefit sage grouse. Knowledge of sage grouse nesting, brood-rearing and winter habitat will be incorporated into the planned projects in a cooperative effort between the BLM and the Idaho Fish and Game Department.

18-5 Refer to Page 85, Alternative C. Fencing is viewed as a last resort pending monitoring and management change.

18-6 Same applies as 18-4.

COMMITTEE FOR IDAHO'S
HIGH DESERT
P.O. BOX 463 BOISE, IDAHO 83701

Boise Idaho
March 12, 1984

Burley District Manager
Bureau of Land Management
Burley Idaho

The Committee for Idaho's High Desert would like to comment on your Cassia Resource Management Plan. We find this draft Plan objectionable on several vital matters. We believe that so many changes are necessary in this Draft Plan that a Final EIS should not just be a comment and correction document, but rather a rewrite of the entire Plan.

Our objections fall into four main areas of the Draft Plan: determination of grazing stocking levels, range condition, and range trend, and monitoring of grazing activities; recreational and natural area resource analysis; economic assumptions and analysis; and alternative generation and selection.

1. Grazing

The most important fact in this entire document is the statement that at present 70 percent of the rangeland is in only fair or poor condition. We feel that there can be no increases in grazing until this situation changes for the better. 19-1

We are very concerned about your methodology for determining grazing stocking levels. In Appendix A, your methodology appears to completely ignore multiple use values. The sample analysis does not take into account soils, wildlife, or recreational values--all of which are essential to multiple use planning. For example, this allotment now has 7 tons per acre erosion. Your plan states that cattle grazing is the major cause of erosion in this area. How can you increase grazing and hold erosion at this 7 tons figure? There is a large amount of deer winter range, crucial deer winter range, pheasant yearlong range, sage grouse yearlong range, and sage grouse winter range. You say, "Wildlife needs, both present and projected, were accounted for prior to determining..." stocking levels. What methodology was used to do this? How can grazing be increased by 120% and range treatments increased by 10% and deer AUMs be increased by 20%? What research supports this assertion in your plan? The Plan has no information of recreational use in this or other allotments. What effect will a 120% increase in grazing and a 10% land treatment have on recreational use? Will ORVs be banned from newly seeded areas? Will hunters and other dispersed recreationists enjoy walking through an area with a 120% increase in cowpies? If not, where will they be displaced to? Soils; water; recreation; wildlife: how does your stocking levels methodology consider them? This must be addressed at greater length in your Final RMP. 19-2 19-3

We are also very concerned about your methodology for determining range condition and range trend. What professional journals or other published sources did you rely on for these methodologies? There are no sources on range management , no articles or reports of scientific studies of range use, that appear in your References section. We strongly feel that your methodology should be backed up by research into its effectiveness. Include your sources in the Final RMP. 19-4

You say that simple implementation of any grazing management system, or a simple delay of turnout in an area, can result in improved range trend. We agree on this--if grazing is held at current levels. We do not agree that this means that range condition is automatically and instantly increased one step (Appendix H-(a)). It takes many years for depleted rangeland to go from one condition class to another, even if the trend is up. Data on this should be available in the Cassia area. What is the actual experience in allotments where a grazing system has been initiated? We further do not agree with your contention that range condition will go up because of range trend improvement, simply because a grazing system or deferred turnout is initiated, if grazing is significantly and immediately increased. What hard data is there to support this contention? On the face of it, your Draft RMP's claim that you can immediately (in Alternative C) increase grazing by 6% on a range which is in 70% fair or poor condition with only 16% in an upward trend; and increase trend to 66% upward, and increase conditions to only 33% fair or poor: on the face of it, this assertion is nonsense. What hard statistics are there to back up this assertion? We believe that your methodologies for determining adjustments in range condition and range trend are incorrect. We believe that there should be no increases in grazing until grazing management systems have had an appreciable effect in improving the range. 19-5

We are very distressed that you do not make a critical distinction in this multiple use RMP. You do not establish a separate category for rangeland which has been the subject of land treatments. In your rewritten Final RMP, there should be five Range condition classes--excellent, good, fair, poor, and "Seeded" or "treated". We believe that range condition should be determined in relation to natural vegetation, not in regards to how good of cattle forage it provides. 19-6

We are very concerned about your provisions for monitoring grazing impacts. Add the term "Grazing cycle" to your glossary. (Also, "Area of Critical Environmental Concern";"active preference";"suspended preference"; and "short term active preference".) Your proposed once-a-year on-site inspections of utilization represent an absolute minimum of monitoring. We believe that BLM personnel should also monitor actual use--not the livestock operator. The additional $10,000 (?) per year amount is negligible compared to the value of the grazing. 19-7

2. Other Multiple Uses Besides Grazing

This RMP is very faulty in its treatment of other multiple uses, especially recreation and natural areas with special values. Your treatment of endangered and threatened species is inadequate and illegal. See page 56: you say under Alternative C that your 82,000 acres of treatments would adversely affect the world's biggest concentration of ferruginous hawks, a candidate species for possible endangered or threatened species status. You speak in vague terms of reducing potential adverse effects of land treatment projects with buffer zones to protect ferruginous hawks and their prey. Your report does not address the questions which must be asked about endangered species: how many ferruginous hawks are there in the area?; how have past treatments in the area affected these numbers?; and what will the cumulative impacts be, given the 40,000+ acres of land treatments you propose in the Raft River Valley? Your monitoring criterion of 25% decrease in nesting numbers or 50% nest failure rate is far too low. Such impacts might be irreversible given your vast proposed plantings in the Raft River Valley. We suggest a 10% nesting numbers or 25% nest failure figure as the point at which all land treatments are halted. Also, include your source of information on these hawks in the References section. 19-8 19-9

Your Current Direction makes the Jim Sage Hills a "Natural Area". (We believe that there are extremely high resource values in this area that make it worthy of wilderness protection.) Explain what this term means as applied to the Jim Sage Hills; explain how a Special Recreation Management Area designation would protect these high values. Also, designate at least 50% of the Jim Sage Hills area as closed to motor vehicles. 19-10

We are uncertain on how you have arrived at a figure of 520 pinyon pine trees to be cut for Christmas trees biennially. These trees are a precious resource to all Idahoans. There is a nationwide glut of commercially grown Christmas trees. We feel that a small number of trees, perhaps 100, should be allowed to be cut annually after a drawing. We feel that this limited cutting would still allow some home use, while preserving the visual appeal of the greater City of Rocks area. We are also concerned about your cutting of cordwood and fence posts on BLM land. The Forest Service has opened up large areas of bugkill lodgepole pine in the Cache Peak area. What further need is there for cordwood and fenceposts in the area? We feel there should be less wood cut from BLM land. 19-11

Recreation is hardly considered in this report. We feel that there should be a recreation map that shows: 1) developed and undeveloped campgrounds, present and proposed, in the area; 2) the Special Recreation Management Areas mentioned in Table 4-16; 3) conflict areas between hikers and horsemen, and ORV users; 4) the Jim Sage Hills Natural Area; 5) potential trailhead facilities; and 6) the City of Rocks "core area". 19-12

You should also address in depth the problem of ORV use areas. A second recreation map would be useful here. We are not opposed to ORV use, but we believe that it should be banned from critical wildlife areas and from areas with high appeal to hikers and horsemen. It is impossible to tell from your analysis on pages 105-106 just how you decide what areas are to be open and what areas closed--as well as exactly where these areas are. Your Final RMP should justify the acreage differences in Table 4-15, and include a map showing proposed open, limited, and closed areas. In any case, we feel you should keep ORVs out of critical winter and spring habitat, and out of at least 50% of your high value recreation lands. 19-13

We are unhappy with the quality of your recreation use level figures. Table 4-34 says that with Alternative D, "Other Dispersed Recreation Activities" (such as hiking) would increase by only 1% over the current direction ~~would make room~~ (and be the same as Alternative B). We feel strongly that a decrease in grazing would lead to a vast increase in dispersed recreation activities such as hiking, horseback riding, car camping, and picnicking. This figure should be changed, along with the economic analysis of benefits from it. 19-14

We are concerned about recreational use in the City of Rocks area. Your Alternative A specifically says, "Development of additional recreational facilities in the City of Rocks core area would be specifically prohibited". No other alternative addresses this issue. Why is development specifically banned now? Why isn't this issue addressed in other alternatives? We believe that the City of Rocks area should be enlarged to include the entire pinyon pine area, with developed and semideveloped fenced campsites away from the core area. There should also be nature trails--and no grazing allowed in the Circle Creek, Smoky Mountain, and other area allotments. These losses may be replaced in other allotments. There should be a small "backcountry" camping area in the City of Rocks with designated campsites operated on a reservation system if necessary. 19-15 19-16

3. Economics

Your economic analysis should be completely rewritten and expanded for the Final RMP. You say on page 117, "All identifiable benefits and costs, to whomever they accrue, were included in the analysis." This statement is worthless without documentation. The complete analysis should be included in the rewritten Final RMP. How was a recreation spending figure arrived at? How many dollars assigned to each hunter day? How were costs of silted-in reservoirs and rivers figured, when these result from increased grazing? What positive benefits would accrue to Oakley, Almo, and Elba if the City of Rocks had a developed, cowpie-free campground? Or if the Jim Sage Hills had two developed trailhead facilities? Are these benefits included? It is impossible to know this without a greatly increased economics section.

We are concerned about your cost-benefit analysis. While you say that all benefits were included ~~[illegible]~~ in the analysis, you also say that (all on page 117, paragraph one) that "it was not possible to determine the level of activity that would occur with no management." We have never seen such high cost/benefit ratios in any EIS before this one. If there is any other method of cost-benefit analysis that is more reasonable than this one--use it in the final RMP. 19-17

Last, we are concerned about the number one assumption underlying this document--that there is an increasing demand for beef in the United States. All the analyses we have read speak of a stable demand for meat, but an increase in the relative consumption of poultry and pork instead of beef. What economic reason is there why the BLM promotes irreversible soil erosion and natural vegetation losses in the name of increased beef production? Exactly what prices for beef are you counting on during the life of this plan? At present, Table 3-12 shows almost all classes of ranchers as losing money; only the 20 largest seem to be breaking even. It seems, also, that under the increased grazing alternatives, only this largest class will gain any significant benefits. If high demand is included in this analysis, and there is in fact low demand and prices for beef, how many ranchers would be forced out of

business? Your analysis of Alternative D speaks of 85 ranchers being forced to seek outside employment to subsidize ranch income. It is our impression that many already are working to subsidize ranch income. Your Final RMP should state how many are already working outside the ranch.

4. Alternatives

A final criticism concerns your range of Alternatives. Any alternative that increases grazing by 34%, in an area with 70% fair and poor condition rangeland, that ignores and degrades areas with high recreation and natural values, and depends on irreversibly treating the vegetation of 27% of an area, while none of that area is managed for wilderness or excellent condition vegetation, can not be termed a "balanced approach to land management." (page 38) Nor do we find Alternative D, which would undoubtedly cause some economic hardship in the short run, as acceptable with its initial 24% decrease.

A truly balanced alternative should be developed and adopted that:

1) protects to the fullest all riparian areas;

2) reduces the amount of land treatments to no more than 20% of the area, and includes forbs, shrubs, and native grasses in all seedings;

3) gives full protection to all sensitive species;

4) promotes development of a wide range of recreational uses and facilities; 19-18

5) places the entire Jim Sage Hills ecosystem above 6500 feet, plus at least two of the springs on the west side, in a highly protected wilderness or Natural Area class, with the most important areas further protected as Areas of Critical Environmental Concern;

6) protects pinyon pines through a lottery of no more than 100 trees per year;

7) maintains grazing at present levels until use of grazing systems brings at least 60% of the rangeland to good or excellent condition, and then increases grazing to no more than 15% or the growth in American beef consumption, whichever is lower;

8) uses BLM personnel for all monitoring of grazing use; and

9) encourages a wide diversity of recreational uses in the City of Rocks area, including developed, full-facilities campgrounds; primitive campgrounds; and backcountry campsites.

Thank you for the opportunity to comment on this draft RMP.

Bruce Boccard
Bruce Boccard
Executive Director

Responses to Letter No. 19

19-1 Increases in initial stocking levels are not proposed on areas in fair or poor condition unless proceeded by a land treatment, management plan or both. Increases will only be given in areas which through the monitoring process show sufficient forage is available.

19-2 A study by Gibbens and Fisser (1975) indicated the application of a proper system of grazing management will increase grass cover. Increased cover will slow erosion. Land Treatments are proposed which will provide additional forage. Therefore, erosion is not expected to increase by increasing livestock use since the land treatment will provide for additional livestock use and grazing will be administered according to a grazing system designed to increase vegetative condition and cover.

19-3 Other resource needs were accounted for on an allotment by allotment basis by evaluating current and proposed numbers with current and proposed condition, trend, and utilization data. If current or projected utilization exceeds the allowable limits, then appropriate adjustments in livestock use was proposed to allow for other resource needs.

19-4 Range conditions and apparent trend were determined by using guidance provided by the range sites inventory method as outlined in the Soil Conservation Service National Handbook dated July 13, 1976, and accepted Bureau methods. BLM policy and accepted procedures were used to evaluate an area for condition and apparent trend. The inventory data was displayed and evaluated on Form ID-4400-1 shown on Pages 189-190.

19-5 Authorized grazing use will be allowed to increase on 33 percent of the allotments, but must remain constant or decrease on 67 percent of the allotments. No increase in livestock use dependent on land treatment or other range improvements will be authorized until the same are completed and providing the necessary forage or functioning to meet the intended need. A study by Leithead (1960) showed that as a result of grazing management which deferred grazing, over 80 percent of the study area achieved an upward change in condition by one classs.

Additionally, a review of 18 studies which compared herbage production under grazing systems versus continuous grazing by Van Poolen and Lacey (1979) showed that herbage production increased by 13 percent when grazing systems were implemented.

19-6 It is agreed that native range condition should be based on a comparison with potential natural vegetation. Considering seedings on this basis or simply lumping them all together in a category which does not distinguish between different conditions would not give a true picture of allotment conditions as a whole. Without rating seeding condition it would be difficult to make sound decisions on future management of these areas. To simply lump all seedings together in one category would provide no more information than doing the same thing with native vegetation.

The condition class rating of the seeded areas was based on a comparison of the percentage of seeded species present versus other species. The condition classes were set up as follows:

Percent Seeded Species Present	Condition Class
76 - 100%	Excellent
51 - 75%	Good
26 - 50%	Fair
0 - 25%	Poor

A total of 94,474 acres have been seeded in the RMP area.

19-7 See Text Revisions for added terms.

19-8 Refer to Page 50, it states threatened and endangered species would be protected in accordance with federal law. Then on Page 100 it states provisions have been made through the statewide RMP guidelines for the protection of threatened or endangered wildlife.

19-9 Studies have shown that you can have this percent flexibility in any one year because of weather or available prey base. The U. S. Fish and Wildlife Service and BLM also recognized that there are limitations to estimating nesting intensities subject to habitat alterations. The percentages given represent acceptable estimates as indicated from both agencies.

19-10 The 1974 Cassia Management Framework Plan designated 27,240 acres in the Jim Sage Mountains as Jim Sage Natural Area. The principal elements of the decision were: 1) to allow continuation of livestock grazing but better organize that grazing by development of an allotment management plan; 2) restrict vehicle usage and limit such vehicles to the existing primitive roads; and 3) seek formal withdrawal of the area from the operations of the 1872 Mining Act, the 1920 Mineral Leasing Act and several land laws. Implementation of these elements were deemed sufficient to protect the naturalness of the area.

A Special Recreation Management Area designation is the basis for regulating recreation use of the area. The natural values will be further protected through the development of an allotment management plan.

19-11 Increase public demand for Christmas trees necessitated a need to evaluate the potential for harvesting Pinyon trees for such use. During the summer of 1981 the City of Rocks Area was intensively inventoried and an activity plan was written for the sustained yield havesting of the Pinyon pine trees.

The plan was adopted providing for the harvesting of 570 trees biennially for use as Christmas trees. This document is available at the Burley District BLM Office for public inspection.

Much of the cordwood and fence posts sold on BLM lands in the RMP Area is juniper wood. The juniper is preferred by many individuals for use as fence posts and firewood. In addition, BLM is currently selling approximately three percent of the woodland products sold in the RMP Area which equals an average of 50 to 60 cords per year over the past ten years.

19-12 As stated on Page 70 of the Draft EIS the majority of recreation use is dispersed in nature. Also Page 13 explains the planning criteria regarding recreation management. Items 1), 2), 3), and 6) will be placed on a map when a final resource management plan is approved.

19-13 ORV use conflicts in the EIS area have not been a significant problem. Based on the proposed alternatives we do not anticipate any significant increase in ORV use or conflicts.

19-14 Our public involvement efforts have not revealed any significant conflicts between livestock grazing use and dispersed recreation activities.

19-15 Within the City of Rocks Core Area, ownership is broken down as follows: Private - 52%; BLM - 29%; Forest Service - 12%; State of Idaho - 7%.

19-16 We stand corrected. See Text Revisions Section.

19-17 The complete benefit-cost analysis is on file in the Burley District Office and is open to public review. The recreation visitor day values used are "willingness to pay values" used by the U. S. Forest Service in their 1980 RPA efforts. These are the amounts people would be willing to pay in addition to their actual costs for that particular recreation experience. Many costs and benefits fall into the category of "intangible;" that is, we know these occur but it is not possible at the present time (given funding, time, and methodological limitations) to place dollar values on these. Items such as the costs of siltation and developed trailhead facilities fall into this category.

All indications are that the demand for federal grazing privileges is high and will continue to remain high in the foreseeable future. The beef prices used in the ranch budget analysis are a weighted five-year average, adjusted to reflect current market conditions. The BLM did not collect data on the number of permittees that currently work outside the ranch to augment their income.

19-18 The suggested alternative is not deemed sufficiently different from Alternative C to warrant analyzing it as another alternative given existing law and Department of the Interior and Bureau policy.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
4620 Overland Road, Room 209
Boise, Idaho 83705

March 21, 1984

TO: Snake River Resource Area Manager, Bureau of Land Management, Burley

FROM: Field Supervisor, FWS, Ecological Services, Boise

SUBJECT: Cassia Resource Management Plan and Environmental Impact Statement, Draft (your letter of 12/5/83)

20-1 Our only comments are in regard to Table 3-7 on page 69. The federal status of the ferruginous hawk is candidate, and should be added to the table. Swainson's hawk should be added to the table. Its federal status also is candidate, and its occurrence is common spring and summer breeder. Attached for your information is part of Federal Register/Vol. 47, No. 251/Thursday, December 30, 1982 showing the status of these species.

We appreciate the opportunity to review and comment on this document.

John P. Wolflin

Attachment

cc: FWS, SE, Boise

Response to Leter No. 20

20-1 At the time of the writing of the EIS the status of the ferruginous hawk was considered a State sensitive species and no consideration was given to the Swainson's hawk. Since that time the Fish and Wildlife Service has identified these two species as candidates for federal status. Since we are bound by law to manage federally listed species as high priority, these two species will be placed on Table 3-7 through this comment as a federally listed species.

Department of Energy
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208

In reply refer to: SJ

March 20, 1984

Mr. Nick James Cozakos, District Manager
USDI Bureau of Land Management
Burley District
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Cozakos:

Thank you for the opportunity to review the Cassia Resource Management Plan (RMP) Draft Environmental Impact Statement (EIS). The plan addresses transmission corridor requirements where Bonneville Power Administration (BPA) may become involved in future decisions. Our response is directed, first, at existing and future corridor needs; second, the need for corridor options; and third, the preference for RMP alternatives.

Existing and Future Corridor Needs

There are several long range transmission studies which may result in new corridors affecting the Cassia RMP area. These are:

AC/DC Intertie Studies: Feasibility studies are being developed on several major AC/DC transmission plans for marketing surplus Pacific Northwest power to the Pacific Southwest. Several of the alternatives could possibly affect the RMP area. The need for increased transmission capacity between the two regions without impairing energy transactions over the Pacific Northwest-Southwest Intertie is one of the issues that is being studied. The attached maps show the general locations that are being considered (see maps, options 3A, 3D, and 4A). They involve line sections from:

(West)	(East)
Garrison, Montana to	Garrison, Montana to
Midpoint, Idaho to	Borah, Idaho to Utah
Valmy, Nevada	

Also, attached is a table taken from the Marketing Group Transmission Subcommittee which provides more detail on the options being considered. No plans or corridors have been selected. It is important that these corridor options not be foreclosed. The BLM state office has been involved in these studies.

138-kV Reinforcement - Heyburn-Haymill, Idaho Area: The second area of possible BPA transmission includes a proposal for reinforcement of the 138-kV system in the Heyburn-Haymill, Idaho area. It is included in BPA's 10-year forecast. The proposal consists of a Heyburn-Haymill 138-kV double-circuit line (5 miles), removal and use of a portion of the existing Rupert-Heyburn 34.5-kV line right-of-way. The portions of the line to possibly be retired are located just north and south of the Snake River bordering the RMP area in Power and Twin Falls Counties. If the need for this project continues, an environmental document will be prepared. If BLM lands are involved with the proposal or alternatives, we will coordinate with BLM.

Existing Utility Rights-of-Way: There are as many as 220 existing rights-of-way within the RMP area. Seventy-seven percent include access roads, power and utility lines. The majority are in populated or residential areas. Wherever possible BPA and other area utilities use existing corridors rather than build on separate rights-of-way. In this regard it is important that the use of existing corridors not be constrained. The location of any new transmission alternatives will be based on a thorough analysis of design and location alternatives in response to the requirements of CEQ regulations.

Need for Corridor Options

The transmission system serving the RMP area is interconnected, providing reliable service and a source of power for any potential new energy users. The need to serve new loads may occur rapidly and may affect the transmission system in different ways. One solution may require new transmission, including projects not currently identified.

Based on the above explanations, RMP alternative B would allow corridor options to be retained, since it has minimal development constraints and no exclusions to future powerline modifications (99 percent of RMP would be open to major right-of-way development).

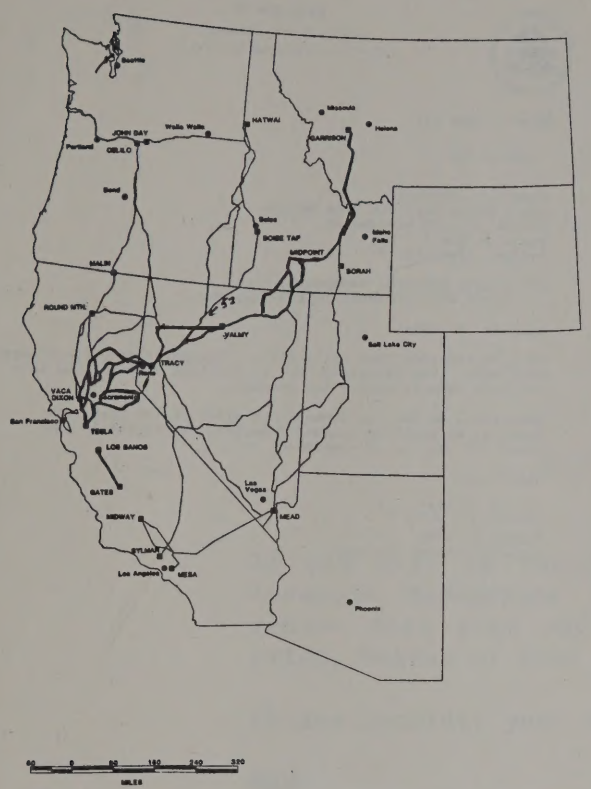
If you should have further questions on the information mentioned above, please contact Mr. Wesley J. Kvarsten, Director, BPA Division of Land Resources.

Sincerely,

Anthony R. Morrell
Environmental Manager

Enclosures

INTERTIE CORRIDOR NETWORK 3A+D



United States Department of Agriculture | Forest Service | Intermountain Region | 324 25th Street Ogden, UT 84401

Reply to: 1950

Date: MAR 20 1984

Mr. Nick James Cozakos
Bureau of Land Management
Burley District
Route 3, Box 1
Burley, ID 83318

Dear Mr. Cozakos:

The Forest Service staff at the Intermountain Regional Office and the Sawtooth National Forest have reviewed the Cassia Resource Management Plan and Draft Environmental Impact Statement. We feel that it is one of the better prepared and written documents we have received.

Our comments and concerns follow:

22-1 There appears to be a lack of coordination between the two agencies as to parcels selected for the Forest Service/BLM land transfer program. Lands identified and submitted to the BLM by the Forest Service Burley District Ranger apparently were not considered in this plan.

22-2 The plan does not provide much direction for a transportation system. Road and trail ROW's need to be reserved over lands proposed for sale or private land exchange. Other ROW's, such as McMillen and North Cottonwood, need to be acquired to provide access to National Forest lands. It would be of benefit to have some sort of 5-10 year proposed schedule for upgrading or maintenance program for the road system.

22-3 It would assist us in our plannig efforts if the plan were to indicate the preferred locations for developed recreation, including capacities. The outputs of developed recreation projected to the year 2000 should also be added to the table on page 105.

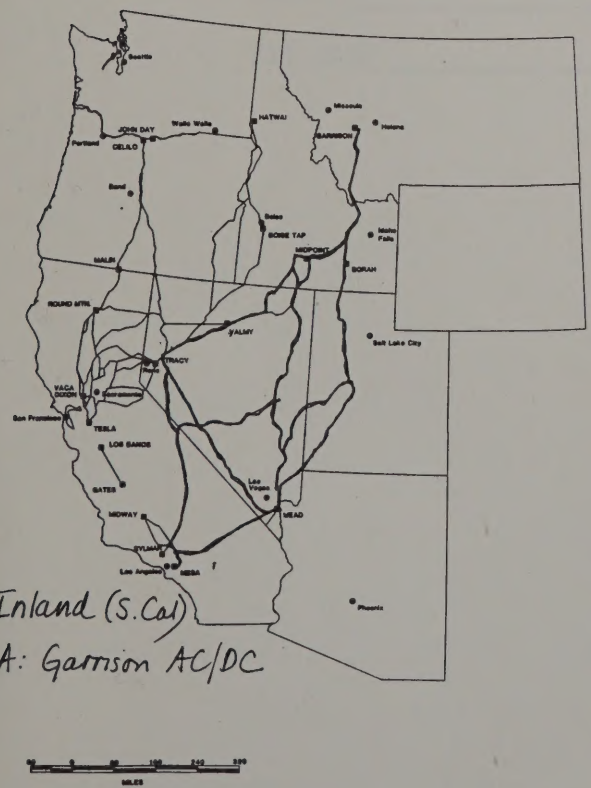
22-4 The plan needs to describe the coordination efforts that have gone on and need to be completed, regarding the City of Rocks planning. The description of area 8 on page 25 does not specifically indicate that National Forest System lands are a part of the unit.

22-5 The plan's alternatives A, B, and C for City of Rocks Management Unit proposed Christmas trees be harvested on a rotational basis with the Forest Service. The Forest Service, Burley Ranger District's, present plans are to continue to sell Christmas trees to the public on an annual basis.

Alternatives B and C indicate that there would be a great increase in sedimentation due to range improvements. This should be a short-term increase and then there should be improved watershed conditions as the ground cover increases from the revegetation.

FS-6200-11b (7/81)

INTERTIE CORRIDOR NETWORK 4A



Inland (S.Cal)
A: Garrison AC/DC

22-6 There appears to be a coloring error in the Land Status Map 1-2. National Forest System land sections 1, 12, 13, and 24, T13S, R29E, have been color coded as state lands; Sections 5, 6, and 7, T15S, R24E, have been color coded as BLM lands.

22-7 The following allotments are managed in conjunction with Forest Service grazing allotment: 62 - Willow Creek; 63 - Mathews; 146 - North Lake Fork; and 145 Shirley Creek. The proposed plan should evaluate the economic and feasibility of managing these allotments by one agency. Other allotments that should indicate a need for coordination between the Forest Service and Bureau of Land Management are: 47 - Hedges; 59 - Big Cedar; 71 - Almo Creek; 128 - Green Canyon; and those portions of 123- Point that are adjoining the National Forest.

We appreciate the opportunity to participate in the BLM planning efforts and request your continuing efforts in providing input into the Sawtooth National Forest Land and Resource Management Plan.

RICHARD K. GRISWOLD
Director, Planning and Budget

Response to Letter No. 22

22-1 The lands identified and submitted to the BLM by the Forest Service Burley District Ranger has not been forwarded to the Burley District to be considered in the plan.

22-2 The need to reserve road and trial rights-of-way will be addressed during the detailed planning phase of the lands disposal program.

It is not the Bureau of Land Managment's policy to provide or acquire access to other federal agencies' lands unless the access is needed to reach Bureau of Land Management administered lands.

The upgrading and/or maintenance of road systems is not part of the RMP, but is part of the activity plans.

22-3 Selecting preferred locations for developed recreation sites was not in the scope of this section. The Required Actions Tables under each alternative (Chapter 2, pages 32, 36, 41, and 45) specify whether or not the management area is identified for recreation facility development. We also have URA overlays in the District Office identifying ROS development zones. The only user data we currently maintain on developed recreation sites is for Salmon Falls Reservoir. We do not have the data to estimate projects use for undeveloped new sites. Too many intangibles exist including public access, proposed facilities, water developments, etc., to estimate recreation capacities. Site specific plans including HMPs, AMPs, Recreation Management Plans will be written at a later date identifying preferred locations for recreation developments.

22-4 The description of Management Area 8 on Page 25 is intended only to identify lands managed by the Bureau of Land Management, not other agencies or private lands. In the Text Revision Section it will be indicated that Map 2-1, Management Unit A, should not include those lands within the National Forest.

A separate plan is currrently being written to update the current management situation at the City of Rocks and make appropriate recommendations from a Bureau standpoint. As you know, the mixed land ownership patterns continue to hamper consolidated planning and management efforts for the area.

22-5 The Bureau will manage the harvest of Pinyon Pine for Christmas trees at an annual level of 285 trees.

22-6 Statement about land status Map 1-2 that shows National Forest System land as State land and Bureau of Land Management land is correct. (See Text Revisions Section.)

22-7 Wherever grazing or allotment management plans are proposed a coordinated planning approach will be used. All affected users and land managing agencies will be invited to participate in each specific planning effort.

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO ATTN OF: M/S 443

MAR 22 1984

Jimmie L. Pribble
Snake River Resource Area Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

RE: Cassia Resource Management Plan
Draft Environmental Impact Statement

Dear Mr. Pribble:

We have received your Draft EIS on the Cassia Resource Management Plan. Unfortunately, due to workload conflicts we have not been able to review the document.

Therefore, we have no comments to offer on the Draft EIS. However, we would appreciate receiving two copies of the Final EIS when it is completed.

Sincerely,

Robert S. Burd
Director, Water Division

NOTICE TO READER

If you wish to receive a copy of the Final Cassia Resource Management Plan decision document, please remove this page and return it to the Burley District, Bureau of Land Management.

Please complete your mailing address.

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